

COMMENTS RE: DNS 13-082
WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE

<p>Bill Essman</p> <p>In my opinion there are some important facts left out and creative writing used to complete this DNS.</p> <p>#8 The following quotes from Dr. McCorquodale's 01/11/13 Colockum Elk Study Presentation are proof that the Winter Vehicle Closure is not effective.</p> <p>-Although the Whiskey Dick Closure did not appear to substantially delay collared elk from moving westbound from the core winter area...</p> <p>-The timing of the elk departure from the winter range fit relatively well with the forage metric (NDVI), suggesting elk moved in response to plant community clues.</p> <p>-Closure wintering elk typically left the winter range before non-closure elk</p> <p>In January, February and March 2013 there were up to 500 head of elk in the I-90 median west of Vantage. On 03/19/13 Washington State Patrol closed I-90 so WDFW could move 250 elk out of the median with a helicopter. There were 18 elk/vehicle accidents during this period.</p> <p>It doesn't appear that they are afraid of the 27,000 vehicles a day traveling I-90.</p> <p>This area appears to be an ideal location for a wildlife tunnel.</p>	<p>The effects of roads on elk have been studied for decades, and Dr. Scott McCorquodale, WDFW's Deer and Elk Specialist, summarized the results of over 50 years of studies. Dr. McCorquodale's paper, "A Brief Review of the Scientific Literature on Elk, Roads, & Traffic", can be found on line at http://wdfw.wa.gov/publications/01491/. No scientific evidence has been submitted, through this SEPA process, to refute the conclusions of Dr. McCorquodale's literature review.</p> <p>Migration cues that prompt elk to move large distances from summer range and winter range do, in part, come from vegetation cycles and environmental factors. However, daily elk movements during winter are influenced by numerous other factors such as weather, disturbance, forage, predation, etc.</p> <p>Elk numbers in the vicinity of the highways did increase last year and again this winter, but those problems occurred in December and January, when no winter range restrictions on motorized vehicles were in place.</p> <p>No helicopter herding operations were conducted along I-90 by WDFW in February or March 2013. However, between December 15, 2012 and January 4, 2013, prior to implementation of the winter closure, approximately 12-14 elk were hit on I-90 west of Vantage. On January 4th, 2013 WDFW used a helicopter to locate and herd elk from near I-90 back onto the Wildlife Area. Washington State Patrol implemented a rolling slow down during the herding operation.</p> <p>After WDFW implemented the winter closure on February 1, 2013, no further elk/vehicle collisions were documented on I-90 during the closure period. WDFW continued to haze elk and use Master Hunters along the I-90 corridor to reduce the potential for collisions.</p> <p>The behavior of elk near the highway is a classic case of habituation. Unlike traffic on primitive roads, highway traffic is continual and predictable, and people do not stop and approach elk on foot, shoot at them, etc. as they often do on the wildlife area. The fact that the elk, in time, have come to tolerate highway traffic does not indicate how they will respond to vehicle traffic on primitive roads and it is not supported by the scientific literature.</p> <p>A wildlife tunnel under I-90 is outside the scope of this proposal.</p> <p>The area south of I-90, where the suggested tunnel would lead is primarily the Army's Yakima Training Center. While the Whiskey Dick Wildlife Area was purchased and is managed by WDFW for big game winter range, upland game habitat</p>
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<p>#11 WDFW Sgt. Mike Sprecher stated that there were no damage complaints/claims in 2006 and 2007 the two years prior to implementation of the Temporary Winter Vehicle Closure in 2008. Increasing numbers of elk have left the closure area during the closure every year since it was implemented.</p> <p>On February 15, 2013 there were 2000+ elk on a private ranch 8 air miles from the western boundary of the winter closure.</p> <p>If damage complaints/claims have decreased in recent years it is probably due to the changes in laws regarding claims and the implementation of the Master Hunter Program.</p> <p>Currently there are 2000 elk on private land outside the winter closure despite the best efforts of WDFW and the Master Hunter Coordinator.</p> <p>Here are several reasons (not stated) that the Colockum Elk herd has increased: -Spike Only General Seasons started in 1994 -All Antlerless Hunts in GMUs 328, 329, 335 were removed in 1997 -True Spike Only started in 2010</p> <p>The Management Population Goal for the Colockum Elk Herd is 4,500 animals. Dr. McCorquodale's study showed that 89% of the cows were bred. Even though WDFW admits they don't know how many bulls are in the population it appears there are more than enough.</p> <p>Bio. Will Moore's 2013 elk survey found 5712 elk. In an October 24, 2013 WDFW News Release Dave Ware stated: "Colockum elk herd is also above management objectives and is increasing."</p>	<p>and wildlife related recreation, these are not the primary missions of the U.S. Army's YTC. The Army's focus is on military training, but YTC does also provide wildlife habitat and public recreation when compatible with the Army's mission. YTC also contains hundreds of miles of primitive roads that are often open to hunters and other recreationists.</p> <p>As per the Officer Log Book of Sgt. Mike Sprecher, there were 22 landowner complaints documented in 2006 and 2007 for the area east of SR97 and north of I-90. Fifteen of those complaints occurred in the Spring Gulch/Parke Creek area.</p> <p>Also, in 2006 Conflict Specialist Novack received an elk damage claim for \$118,000, and in 2007, he issued 28 damage control permits to 4 different private landowners.</p> <p>WDFW did not document that number of elk on private land, but during the annual survey in March 2013, there were over 1500 elk west of the Wild Horse Wind Farm. Many of these were on public land, but some were also on private range land and in the vicinity of private agricultural areas. During the same survey there were also over 1700 elk within the Whiskey Dick Wildlife Area, which was closed to the use of motorized vehicles.</p> <p>Agricultural conflicts have been reduced, though not eliminated, through a series of management actions, including the seasonal winter range restrictions of the past 6 years. When looking at data collected from 99 GPS collared female elk from 2009-2012, we observed only 0.24% of locations in agriculture fields during the closure period of February 1 to April 30.</p> <p>Several large groups of elk have been using areas from Reecer Creek to Caribou Creek to the Vantage Wind Farm in the past month, but since no winter closures have been implemented this winter they couldn't be expected to be a factor.</p> <p>These management changes have influenced the size and composition of the Colockum elk herd, but they have little bearing on where the elk choose to spend the winter.</p> <p>The breeding season for elk is in September and October, long before the proposed winter range closure to motor vehicle. Motor vehicle restrictions on a small portion of the winter range during February-April should not be expected to influence bull ratios. The total number of elk in the Colockum Elk Herd is above objective, but the bull:cow ratio is still below objective.</p> <p>Over the past 10 years, the total Colockum elk population has increased by over 2000 animals, while damage claims have been decreasing.</p>
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<p>Bob Stokke I have been a Washington resident since birth in 1946. I have hunted elk since 1962. In the late winter months (Jan, Feb, March, Apr), elk are living on their fat reserves as there is barely enough nourishment in the forage available for them to sustain them until the spring green up. Elk are very sensitive to vehicle traffic on roads and road closures are a great way to protect them during this time. I totally support the 'Whiskey Dick Wildlife Area Seasonal Road Closure' as proposed in the DNS as published.</p>	<p>Thank you for your support.</p>
<p>Cindy Gutzwiler I would like to let you know that I do not approve opening any more roads in the Colockum or Whiskey Dick areas. If anything, more roads should be closed. We just don't need more people down there disturbing the wildlife at any time of year.</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although this proposed temporary closure is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>Jen Watkins – Conservation NW I am writing to provide comments on behalf of my organization and our 4,500 membership households on the Determination of Nonsignificance (DNS) 13-082: Whiskey Dick Wildlife Area Seasonal Road Closure. We strongly feel that all information, including that in your own SEPA checklist provided with the DNS documentation, indicates that the winter closure as it has been defined from 2008-2013 contributes both to the health of the Colockum elk herd and their movement patterns involving potential conflicts on private lands. We see absolutely no ecological indication or study that states an increase in disturbance during winter would be neutral to the elk herd or other species using this area such as bighorn sheep and greater sage grouse, but instead we read that this herd is already below population objectives overall and facing multiple threats to their health notwithstanding lack of habitat removed from human disturbance. We also recognize that your department in collaboration with the Washington Department of Natural Resources is publicly involved in a collaborative planning effort to determine the longer term management plan for this landscape including the balance for providing recreation and habitat values for this herd. Therefore, it seems an inappropriate time to alter the existing and effective ongoing management trend of winter closures in anyway prior to completion of this planning effort. Within the Naneum Ridge to Columbia River planning process, we have only seen</p>	<p>We concur that the proposed temporary closure of roads in the winter range is supported by information in the checklist and in the literature.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter</p>

evidence through the analyses being prepared by your agency that show the Colockum elk herd population requires greater access to habitats without human disturbance in all seasons, rather than any indication that human use in this area should be expanded upon.

Therefore, we believe that the opening of the road that bisects the 44,000 acre winter closure area running from the Quilomene Ridge Road to Gingko State Park area is significant and the DNS should be withdrawn. We suggest instead that you maintain the winter closure for the Quilomene area to motorized recreation as it has been since 2008 without the opening of this road, and allow the question of whether or not to open the road and expand access to be answered through a thorough analysis and public process within the Naneum Ridge to Columbia River Recreation Planning process. Our rationale for this position is expanded upon below.

Expanded winter use contradicts existing studies, land management priority for wildlife, and Colockum elk herd management plan:

Your DNS letter states that the management goals for the LT Murray/Quilomene/Whiskey Dick Wildlife Areas “are to preserve habitat and species diversity for both fish and wildlife resources, maintain healthy populations of game and non-game species, protect and restore native plant communities, and provide diverse opportunities for the public to encounter, utilize, and appreciate the wildlife and wild areas.” This builds on the history that the Colockum, Quilomene, and Whiskey Dick areas were purchased specifically to provide “big game winter range and upland bird habitat, and also to provide diverse wildlife related recreational opportunities such as hunting, fishing, and wildlife viewing.” It is clear from this history and policy language that the primary purpose for all management decisions is to ensure healthy wildlife, especially game species, and then to provide recreational opportunities to enjoy the land and the healthy populations. Although the last 5 years of season closures appear to be contributing to a trend of a healthier herd, the following statements about the herds health contradict the idea that they are in a state where additional disturbance could be considered:

-- January 20131, “Most Colockum cow elk were in modest to marginal physical condition entering winter.... Data for Colockum elk (and Yakima elk) clearly demonstrate that wintering elk in this region are in marginal physical condition during the mid to late winter period (energy stores are low)
-- January 20132, in a Yakima Herald article interviewing WDFW staff it was stated regarding the closure that “Preventing elk from going where you don’t want them to go is probably one of the less common reasons....A bigger reason, he said, was to minimize disturbance to elk whose body-fat content is down to a survivable minimum after a fall spent avoiding hunters and finding diminishing forage as the winter approaches. The average body fat for Colockum elk females in the early fall is roughly 15 percent. By the end of the winter that can be below 4 percent. Most of the cows are in pretty modest condition in the winter,” McCorquodale’s said. “They’re not ready to fall over and die, but they’re pretty lean. I think one of the best reasons to contemplate some

range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.

WDFW is not proposing the opening of a road, but the closure of most of the roads that are currently open within the Whiskey Dick Wildlife Area.

The Colockum elk herd was below population objective in recent years, but it has since recovered. The total number of elk in the herd is now above objective, but the bull:cow ratio is still below objective. Over the past 10 years, the total Colockum elk population has increased by over 2000 animals, while damage claims have been decreasing.

We agree with your interpretation and presentation of WDFW’s management objectives for the LT Murray Wildlife Area and your summary of the information that we have provided regarding Colockum elk and the Whiskey Dick winter range. Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary, seasonal closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.

Recent winter range closures on the Whiskey Dick Wildlife Area and this proposed temporary closure were all intended to reduce disturbance on portions of the winter range to help reduce elk damage to private agricultural lands to the west.

Agricultural conflicts have been reduced, though not eliminated, through a series of management actions, including the seasonal winter range restrictions of the past 6 years. Over the past 10 years, the total Colockum elk population has increased by over 2000 animals, while damage claims have been decreasing.

kind of closure or restriction on access during the winter is just that those elk, we've harassed them pretty much all fall."
-- February 3, 2012 (PDF presentation) "Bull Management....Spring Bulls Ratio..chronically below objective."

Additionally, statements from your agency affirm that the closure has been effective rather than neutral or ineffective meeting the goals of this land and this herd including statements such as:

-- January 2013 (same presentation as above), "Closure wintering elk use was closer to roads than use for non-closure elk, reflecting the availability of habitat distant from roads.... Closure wintering elk appeared to become less sensitive to road effects during the closure period; not so for non-closure wintering elk."

-- December 2013 in the DNS public letter on this management proposal it states, "With implementation of the seasonal motorized vehicle restriction, hunting restrictions and other management actions, private land damage complaints have decreased, total herd size has increased, the herd size in the southern portion of the winter range has increased, and antlerless harvest opportunities have been partially restored. Not all of these positive trends can be attributed to the restriction of motor vehicles, but it has been one of several related management actions."

The latest version of the Colockum Elk Management plan recognizes the need for managing access and human disturbance year round to ensure a healthy herd, while also addressing conflicts due to movements onto adjacent land. The plan states that the impact from human use occurs not only on the road but an influenced zone around it, "Peek et al. (2002) in a report to the Washington Fish and Wildlife Commission stated 'Most authorities recommend restrictions in human activity to reduce displacement and energy loss in winter.'.... Powell and Lindzey (2003) found elk avoid areas within 1.2 miles of major roads in summer and 0.6 miles in winter in open habitat in Wyoming.... An effective strategy for elk is to fatten up in the fall, then conserve energy during the winter. On winter range, habitat improvements may be helpful, but limiting disturbance so elk make more effective use of existing forage may be more critical."

On February 3, 2012 (PDF presentation) your staff stated in a presentation that "Having minimal area unaffected by road influences on a landscape would be expected to perpetuate the kinds of management challenges currently faced in the Colockum."

Lack of capacity to monitor unauthorized use off of the newly opened road

The DNS letter and SEPA checklist recognize that the opening of a through road would "require increase enforcement" to ensure that not only are people obeying the closure of the remaining Green Dot roads, but also not conducting any unauthorized use off of the through road. The road also required action by Washington State Parks Department, who has closed many parks due to lack of capacity to maintain or ensure enforcement of their facilities. We note that your agency has also received many budget reductions, and find concern with the lack of description in a finding of no-

We would not expect this proposal to have an effect on bull:cow ratios in the Colockum herd.

This response to motorized vehicles, which is well documented in scientific literature, was observed (though not tested statistically) during the Colockum Elk Study.

This proposal is to close most of the roads within the Whiskey Dick Wildlife Area, so the enforcement emphasis would be to ensure that the public understands and complies with the seasonal closures during February-April, 2014. The miles of open roads that would need to be patrolled would be reduced from the current condition.

significance with the ability of your agency to manage legal use in this area that faces increasing human pressure.

Recreational access is maintained with the closure, and public opinion by user groups support the closure

The DNS letter states that WDFW's mandate is to "preserve, protect and perpetuate fish, wildlife, and their habitats, and to maximize sustainable wildlife-related recreation."

Motorized recreation will continue along the periphery of the closure area on through roads that remain open, while we would assert that "wildlife-related recreation" that the department is mandated to promote in balance with the health of the landscape and species is not only maintained by likely expanded with a full seasonal closure that does not include the opening of a through road. Skiing, snowshoeing, photography, and wildlife viewing are all still permitted during the full closure and may be improved with the solitude afforded during this season. We would also note that the health of the herd is directly related to the quality of the hunting season, and certainly providing the most effective winter security habitat that the department can ensure on our public lands contributes to that "wildlife-related recreation" as well.

Your own SEPA checklist states that an "overwhelming majority" of all types of hunters support using road closures to maintain healthy game populations during critical periods of the year. Past documentation for these winter closures released by your agency state that the closure as it was presented from 2008-2013 was exactly for these purposes. In a 2012 news release on this closure, your agency stated "Continuing to track elk this winter will help us judge the effectiveness of the closure....Based on data we've previously collected, we would recommend permanent seasonal vehicle closure." It went on to re-affirm that "Research from across the western United States indicates vehicle traffic can disturb elk and significantly reduce their use of habitat near roads....The zone influenced by roads can be quite large in open areas such as the Colockum elk winter range."

Conclusion

We understand the multiple uses that our public lands provide, and our staff and members utilize the planning area not only for work but recreation. However we strongly believe that we must present a balanced system of access with sustaining our natural resources including fish and wildlife populations over time, and that all decisions identifying that system should be well informed by science as well as social desires. There is a greater need than ever for our public lands to evaluate their role in providing healthy watersheds and wildlife habitat due to increasing development pressure on adjacent private lands, annual habitat impacts both positive and negative from fire seasons, a growing recreating public. In addition to those existing issues, we must consider the anticipated impacts from a changing climate not only impacting our natural resources but increasing the vulnerability of our transportation and recreation system. We urge you to withdraw the DNS and maintain the existing winter closure that has been in place since 2008, while allowing a robust dialogue and analysis to continue in the Naneum Ridge to Columbia River Planning Process to guide

Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities.

There is no existing winter closure in place. This proposal is to implement a closure of most open roads within Whiskey Dick Wildlife Area during February-April, 2014.

Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is

<p>future management in this area. Please contact us with any questions regarding these comments and to continue the dialogue. We would only add that following the legislative interference with the outcomes of the collaborative Naneum Ridge to Columbia River Planning Process, it is all the more important that your decisions allow for quality public input as well as are based on science to ensure they meet the mandates of your agency.</p>	<p>required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>David Knibb I would like to comment on the proposal announced two days before Christmas to maintain a seasonal closure, but to open for motorized use during that closure one road through the Whiskey Dick Wildlife Area and Gingko Petrified Forest State Park. For the reasons explained below, you should keep all roads closed during the February-April period. I do not live in Kittitas County, but I have hiked in this area, written about it, and am familiar with it. I suspect you are receiving numerous comments from local residents who would like to use this area for their own purposes. As a former Forest Service employee based on a rural ranger district, I know what those local pressures can be like. I hardly need to remind you that these are lands managed by the state for state purposes. I will rely upon your professionalism to manage these lands in the interest of the state. It is important to put this proposal in context. From a wildlife perspective, these lands are unique. When officials evaluated the North Cascades as a potential grizzly bear recovery area, they were concerned that most snow-free spring range in the Cascades was also heavily used by humans. The Colockum Wildlife Area and the two wildlife areas adjoining it were the one exception. This was the only place in the Cascades where you still could walk from mountaintop to riverbank without crossing a highway or railroad. And it still is. The Colockum was excluded from the grizzly bear recovery area, but Curt Smitch, who was then Fish and Wildlife Department director, assured state and federal land managers that "the way we manage the Colockum is consistent with the way we would manage for grizzly recovery." In short, this area offers the only spring range in the North and Central Cascades that is relatively free of human activity. Not only is this critical for elk, bighorn sheep, and other ungulates, but for a variety of other wildlife, including, potentially, grizzly bears. As a former forester, I am certainly familiar with the concept of multiple use. But these lands were bought years ago and have been managed ever since primarily for wildlife. That should continue to be their primary use, and any other uses should be allowed only insofar as they do not compromise the use of these lands for wildlife. With these general points in mind, let me mention six specifics. 1. The period from February 1 to April 30 is critical for wildlife. Scarce forage stresses ungulates. Pregnant elk cows are about to calve (starting mid-May). Whiskey Dick and Gingko State Park are among the few areas available to them that are relatively snow-free and disturbance-free. Hence, these areas are especially important to elk, mule deer, and the bighorn sheep I have observed there.</p>	<p>Thank you for your support.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>We believe the proposed temporary closure of most Whiskey Dick Wildlife Area roads is consistent with this objective.</p>

<p>2. Motorized access during this period will reduce use of this area by wildlife. Studies show that elk are sensitive to the presence of motor vehicles. Per the 2013 study by Dr. Scott McCorquodale, "A Brief Review of the Scientific Literature on Elk, Roads, and Traffic", cited in your SEPA Checklist: "The scientific evidence is compelling that disturbance associated with traffic on open roads can strongly affect elk distribution and limit use of even highly preferred habitat near roads."</p> <p>3. This scientific evidence supports your proposal to keep most roads in the area closed, but your proposal to open the road from Quilomene Ridge through Ginkgo State Park during the months of February through April flies in the face of this evidence.</p> <p>4. Depending on the width of the disturbance zone created by opening this road, it could make most of the Whiskey Dick Wildlife Area "off limits" to elk during the critical Feb-April months. If elk were already in the area -- as they likely would be because it is some of the best winter range -- they would move out when motor vehicles moved in. If they moved south, they could end up as road kill on the Vantage Highway or Interstate 90.</p> <p>5. The proposal does not address how much your agency or the State Parks Department would patrol this area during the Feb-April period. Such patrols would be needed to keep vehicles from driving around gates to use other roads or to use the many unauthorized roads already created by users in this area. It is much easier to keep motorized traffic out of the area entirely during a seasonal closure than to confine that traffic to designated roads. Given the budget constraints on state agencies, you would be relying mostly on an "honor system" by users to stay on the right road. Most would comply, but those who do not could cause much damage.</p> <p>6. Feb-April is the spring thaw when roads are soft. Allowing motorized use of any unpaved roads during that period will create ruts, bogs, user-created bypasses around bad spots, and erosion. The overall effect would be to widen the area impacted by the road.</p> <p>Thank you for considering my comments. I support keeping all roads closed to motorized use in the Whiskey Dick winter range from Feb. 1 to April 30.</p>	<p>The reduction of elk disturbance, displacement and conflicts with private agricultural lands are important justifications for this proposed closure of most open roads with the Whiskey Dick Wildlife Area.</p> <p>This proposal is to close most of the roads within the Whiskey Dick Wildlife Area, so the enforcement emphasis would be to ensure that the public understands and complies with the seasonal closures during February-April, 2014. The miles of open roads that would need to be patrolled would be reduced from the current condition. Signs and notices will be used to increase public awareness and compliance.</p> <p>Most roads within the Whiskey Dick Wildlife Area would be closed to motor vehicles during this winter-spring period so road impacts would be reduced compared to the current condition.</p>
<p>Dennis/Arvilla Ohlde</p> <p>This SEPA is yet one more example of WDFW's systematic and relentless road closing agenda in Region 3. The track record of Region 3 to close roads to eliminate traditional motorized travel in this general landscape is well documented. Citizens and the Kittitas County Field and Stream Club challenged the closure and annihilation of Tekison Creek and Stray Gulch roads starting in early 2012 regardless of our challenge of the underlying action of the project. The project was completed in secret and hydraulics/erosion problems were fixed by WDFW with a clandestine helicopter operation in early April 2013. The reason WDFW Region 3 rushed this project in April is because our challenge was formidable and all elements of it were proving to be correct. The month of April would be during the epicenter of the most sensitive time for "fish" that are alleged to be in the streams. The project</p>	<p>The Stray Gulch and Tekison Creek Road Abandonment Project is outside the scope of this proposal.</p>

timing violated every syllable of the Departments own SEPA that they wrote for themselves, self- regulated and self-enforced. In the end, WDFW confirmed to everyone that their concern for “fish” actually stops at a point where they no longer need “fish” as a code word to gain support and / or funding for their projects. A close reading of this Winter Closure SEPA document exposes similar tendencies. These actions and others lead us to be skeptical about the rationale for road closure projects in general, but also the questionable projects and the questionable methods. (Including the use of photos taken turning historic, record-breaking rainfall events.) These photos were used to embellish water flow on roads and they showed up in five separate official documents or presentations including a SEPA document to close Stray Gulch and Tekison roads. We have no reason to believe that any of their tactics have changed as they make yet another Determination of Non- Significance (DNS) on their own project.

WDFW’s tendency towards the use of “fantasy science” and “fiction writing” was highlighted by the 2013 Legislature when it passed a law that essentially states that WDFW can’t lie on documents and their science must be verified. Bugle Magazine articles do not qualify as scientific proof and subjective opinions won’t work anymore either. Opposition to this winter closer proposal comes from a broad base of citizens (almost 600 signatures and KCFSC) as well as community leaders (Chamber) local elected (County Commission letters) State elected officials (Proviso) and Sportsmen Groups (WWC/HHC) letters. WDFW’s refusal to acknowledge the reality of this overwhelming opposition to their agenda is especially troublesome when they exaggerate their alleged support for this closure after public meetings that clearly reflect the opposite.

The 2013 legislature sent another strong message to WDFW by passing a proviso that carries a theme mandating that roads stay open for motorized travel. The skepticism that prevails amongst citizens and elected is magnified when WDFW in Region 3 constantly twists the narrative in their writing and documents to run things their way (i.e. “fiction writing”). They need to be reminded that these are our lands not theirs.

In Section A-Line 7: of the environmental checklist WDFW answers YES to the question as to whether future additions or expansions are planned. The answer given discusses the Naneum to Columbia Recreation Plan which calls for a Program SEPA document separate from this Project SEPA document. Therefore the two issues are not related. We

The entirety of House Bill 1112 can be found at the following site: <http://apps.leg.wa.gov/documents/billdocs/2013-14/Pdf/Bills/House%20Bills/1112.pdf>

In part, House Bill 1112 states that: “(1) Before taking a significant agency action, the department of fish and wildlife must identify the sources of information reviewed and relied upon by the agency...” and “(2) (a)...“significant agency action” means an act of the department of fish and wildlife that: (i) results in the development of a significant legislative rule... (ii) Results in the development of technical guidance, technical assessments, or technical documents that are used to directly support implementation of a state rule or state statute; or (iii) Results in the development of fish and wildlife recovery plans.” This proposal is not a “significant agency action” as defined by H.B. 1112, but we have referenced the best available science.

The 2013 proviso states: “...\$25,000 of the appropriation is provided solely for the department to construct a primitive road, of a minimum of one mile, with no adverse impacts on streams or riparian areas, in the Naneum road planning area within Kittitas county. This is to replace the lost general public access as a result of the Stray-Tekison road abandonment. The department shall collaborate in the placement of the road with the Kittitas county field and stream club. Further, as part of the Naneum to Columbia river recreational planning process, the department is instructed to adopt a plan that results in a net increase of green dot access roads in Kittitas county.” This proposal is not related to the Stray-Tekison road abandonment and it is not the outcome of the ongoing Recreation Plan.

The current proposal is to close the majority of the roads that are currently (December 2013) open within the Whiskey Dick Wildlife Area during February-April, 2014. This area is also

<p>believe that the real premise for WDFW to answer YES to this question is for the purpose of expanding the “winter” closure to more of the landscape as well as adding an extended time frame.</p> <p>Question 1-F in Section B is answered – YES by WDFW. This is an unqualified and subjective opinion not based on science as required by 2013 House Bill 1112 RCW 34.05 new section 1 & 2.</p> <p>Question 2-A in Section B is answered by WDFW in a manner to imply that vehicles in this area during February, March and April will distribute exhaust omissions and cause dust at harmful levels and in a negative fashion. This is an unqualified and subjective opinion not based on science as required by 2013 House Bill 1112 RCW 34.05 new section 1 & 2.</p> <p>WDFW’s answer to question 3-A1 Section B is another embellished description of these streams to sensationalize their status. The use of the word “primary”, would have worked quite well here but that doesn’t get the attention of proponents’ sympathy for this project that have most likely never been to this 44,000 acres of public land.</p> <p>WDFW’s answer to question 3-A5 Section B will be particularly troublesome for them to defend given the abysmal reputation they have in Region 3 of exaggerating “flooding” to justify closing roads in other parts of the Quilomene, Colockum and Whiskey Dick as well. Secondly, according to FEMA none of the area proposed for this “winter closure” is within the 100-year flood plain as WDFW erroneously stated. Therefore, WDFW must provide verified science (including photos and maps) as required by 2013 House Bill 1112 RCW 34.05 new section 1 & 2.</p> <p>WDFW’s response (“will reduce erosion”) to 3-C-1 Section B in the 3rd sentence is an unqualified and subjective opinion that is not the premise for the description asked for. Furthermore, the sentence is not based on science as required by 2013 House Bill 1112 RCW 34.05 new section 1 & 2.</p> <p>WDFW also states the following: “most roads within the</p>	<p>included within the ongoing Naneum Ridge to Columbia River Recreation Plan which will guide recreation management over the longer term. The temporary closure decision is independent from the long term planning process. Each decision can proceed regardless of whether the other one does.</p> <p>Erosion is a commonly observed result of the use of motorized vehicles on wet roads – particularly on silt/clay soils and steep slopes. During most winters and springs, the road conditions on the wildlife area are wet and muddy. There are documented locations within the proposed closure area where wet conditions have prompted drivers to leave the roadway and create a parallel road through undisturbed soil and vegetation. Temporary road closures are a commonly applied practice, utilized by other land managing agencies in this region such as US Forest Service and WA Department of Natural Resources, to reduce damage to wet roads.</p> <p>When vehicles are used, they create emissions and have the potential to cause dust when used on unsurfaced roads. In the checklist, we offered no opinion regarding “harmful levels” or “in a negative fashion”, but stated that “Exhaust and dust will be reduced on the road segments that are within the area with the 3 month seasonal restriction on motor vehicles”.</p> <p>Please refer to the Department of Ecology link https://fortress.wa.gov/ecy/coastalatlus/tools/FloodMap.aspx to view floodplain maps. The Kittitas County FIRM map 5300950500B depicts both lower Skookumchuck and Whiskey Dick Creeks as Zone A (Areas of 100-year flood). Many roads within the proposed winter range closure area cross the named streams and their tributaries without structures such as bridges or culverts, thus vehicles must enter the streams’ floodways to cross when the roads are open.</p> <p>Erosion and rutting are well documented results of driving on wet, native surface roads where runoff water is not managed by control structures such as water bars or catch basins. These impacts are commonly observable on the Wildlife Area, and this issue is discussed in greater detail by the TFW Effectiveness Monitoring and Evaluation Program, in a paper titled “<i>Monitoring Effectiveness of Forest Practices and Management Systems - Surface Erosion Study Design Guidelines, Procedures, and Methods</i>”. A copy of the paper can be found online at http://access.nwifc.org/tfw/documents/sesd11.pdf</p> <p>From the 2010 L.T. Murray Wildlife Area Management Plan</p>
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proposed winter range closure area lack water management structures such as water bars or catch basins” our question is -- why do these areas lack water management structures? These roads are open for motorized travel for nine months out of the year outside of the proposed winter closure. Show us by way of the WLA Plan, employee work plan or engineering plan (hopefully in process) that “fix the problems” related to the water crossings. The lack of plans or management direction in this regard will support our challenge thesis. Siltation and erosion are the result of poor maintenance planning by the WLA manager who would rather see all of the roads closed.

WDFW’s comment in 3-d Section B is an unqualified and subjective opinion that has no basis in fact. The proof of scientific fact and analysis must be shown to back up this totally erroneous and misleading comment as per legislative law 2013 House Bill 1112 RCW 34.05 new section 1 & 2. There is also a need to invoke reasonable and practical common sense.

WDFW answers none to question 4-b Section B. This closure is allegedly designed to potentially accommodate several thousand elk. The answer given by WDFW assumes that those elk won’t be grazing if no vegetation will be removed or altered on this landscape. This assumption would also lead a logical person to endorse without opposition the future grazing (or application for grazing) of a similar number of cattle in the same area and that cattle grazing would not create a negative impact. For now, I want to see scientific data that verifies the impact from elk grazing is -----“none”.

WDFW states in 5-b Section B that upper-Columbia River steelhead-Federal Threatened are on or near this site. This

Update:

Agency Objective: Minimize Adverse Interactions Between Humans and Wildlife.

1. Monitor and manage public access to minimize negative effects on fish and wildlife

A. Strategy: Develop a Road Management Plan that balances wildlife refuge requirements with public recreation and access needs. Timeframe: 2013

B. Strategy: Improve the Whiskey Dick Ridge Road and close the Whiskey Dick Creek Road to reduce stream impacts and create a safer travel route. Timeframe: 2013

As stated above, WDFW acknowledges the need to maintain public motorized access to the wildlife area, and identified a specific project to work toward this goal. In 2012, capital funds were available for road improvements, and the Whiskey Dick project was proposed, but due to opposition during the SEPA process and the initiation of the Naneum Ridge to Columbia River Recreation Plan it was not implemented.

WDFW is now involved in the Naneum Ridge to Columbia River Recreational Planning process in cooperation with WA Dept. of Natural Resources and a citizen advisory panel to help identify what areas and types of recreation are most valued by the recreating public. This process will help prioritize projects and subsequently help secure funding to accomplish the plan goals.

Erosion and rutting are well documented results of the use of motorized vehicles on wet, native surface roads where runoff water is not managed by control structures such as water bars or catch basins. These impacts are commonly observable on the wildlife area, and this issue is discussed in greater detail by the Timber Fish and Wildlife (TFW) Effectiveness Monitoring and Evaluation Program, in a paper titled *“Monitoring Effectiveness of Forest Practices and Management Systems - Surface Erosion Study Design Guidelines, Procedures, and Methods”*. A copy of the paper can be found online at <http://access.nwifc.org/tfw/documents/sesd11.pdf>

The action being proposed is the temporary closure of some roads to motorized vehicles. This action does not cause loss of vegetation.

The elk herd will consume about the same amount of forage wherever they feed. This proposal is intended to influence the distribution of the elk not how much forage they consume.

Steelhead are well documented in the Columbia River, which is the eastern boundary of the proposed winter range

statement is false and is simply designed to elicit false concern from fish conservationists and sport fishers who trust this SEPA document is backed by scientific proof. Therefore, provide me scientific proof as per legislative law [2013 House Bill 1112 RCW 34.05 new section 1 & 2]. A possible source for you to consider is WDFW's internal Data Base.

5. C Section B addresses wintering elk and deer moving north and east. The elk would prefer to move farther south if they could pass through a Wildlife Tunnel under I-90 to access over 500 square miles of accommodating public land. This document alleges to provide a theme of what is best for elk. If a future I-90 tunnel that prevents this proposed winter closure is not in the best interest of elk-----explain why. Having this new "potential travel corridor" would seem like a win-win for elk conservation, highway safety and recreational users of the Whiskey Dick. This also meets the Conservation Northwest organization's I-90 corridor wildlife tunnel agenda. 5-d Section B addresses elk disturbance and displacement. The proposal for this closure is not based on scientific proof that having the alternative (area open to motorized travel) is harmful to elk. If we can assume that scientific proof can be provided regarding disturbance in general, the Modern Firearm Elk Season will also be shown to be a significant disturbance and displacement factor in the life of especially 5-month old calf elk and freshly bred cow elk as well. Therefore, the same methodology and focus WDFW uses to acquire alleged scientific proof of disturbance should also be considered for the time and manner the Modern Firearm Elk Season is conducted and administered in the entire Colockum. We need an answer as to why a political decision to sell tags and licenses for revenue, that intentionally induces actions to disturb and kill elk, supersedes consideration for what is actually better for elk, as per their health, welfare and overall conservation as they go into winter. In other words, consider this thought to frame your answer: How is it that relatively few vehicles per month passing through this landscape on legal Green Dot roads during each of the closure months, causes all of the alleged disturbance and damage, but the hundreds of vehicles causing massive disturbance during the Elk season is somehow okay? Finally on this point—We suggest WDFW ask the Rocky Mountain Elk Foundation (RMEF) if they would rather have a "winter closure" that has no scientific basis to justify it, or would they rather have their access to the Modern Firearm Elk Season further restricted (walk-in only) or simply eliminated because that activity is a

seasonal closure. The hyperlinked study below has a map of the Upper-Columbia streams that were surveyed and also occurred within the closure area.

Surveys documenting steelhead presence can be found in the research document "*Steelhead Spawning Ground Surveys, Temperature, and Discharge Monitoring in Small Tributaries of the Columbia River Upper Middle Mainstem Subbasin, 2005-2007*" written by Casey Baldwin. The document can be viewed online at: <http://wdfw.wa.gov/publications/00847/>

In his paper, Mr. Baldwin states, "...*The spawning ground surveys identified steelhead spawning, live adult steelhead, or carcasses recovered in Squilchuck, Tarpiscan, Trinidad, Tekison, Quilomene, Brushy, Skookumchuck, and Johnson Creeks.*"

A wildlife tunnel under I-90 is outside the scope of this proposal.

The area south of I-90, where the suggested tunnel would lead is primarily the Army's Yakima Training Center. While the Whiskey Dick Wildlife Area was purchased and is managed by WDFW for big game winter range, upland game habitat and wildlife related recreation, these are not the primary missions of the U.S. Army's YTC. The Army's focus is on military training, but YTC does also provide wildlife habitat and public recreation when compatible with the Army's mission. YTC also contains hundreds of miles of primitive roads that are often open to hunters and other recreationists.

WDFW's mandate is to preserve, protect and perpetuate fish, wildlife and their habitats, and to maximize sustainable wildlife-related recreation. Therefore, providing hunting recreation is a key part of our mission.

Seasonality is very important regarding disturbance. Other than in situations of crop damage, very few elk seasons extend into the critical late winter/early spring period when this winter range closure is proposed to take effect.

<p>proven Elk disturbance factor? There are more “poaching” violations during the Elk Season than any other time of the year. WDFW, RMEF, WSA and other proponents in favor of this proposal cannot have it both ways. We are forced to raise the specter of this un-spoken truth as we continue to defend traditional motorized recreational access to our public lands. We look forward to any challenge of our statement in an anticipated formal forum. The “guests” at the top of our list will be Fish and Wildlife Enforcement supervisors and officers in Region 3 that have either worked the Colockum Elk Season or can provide arrest data and professional insight. Our other “guests” will be Region 3 Biologists and Land Managers who will explain with specificity--- why are West Bar Cow Elk permits issued to hunters during the Modern Firearm Elk Season?</p> <p>WDFW’s answer to Question 7 b-2 Section B implies that without the closure, there would be noise occurring from motorized vehicles at unacceptable decibel levels. This is one of the most unbelievable examples of “fiction writing” We have ever seen come from WDFW to date. Therefore, this unqualified and subjective opinion needs a desperate attempt at scientific backing to meet the requirements of the legislative law, 2013 House Bill 1112 RCW 34.05 new section 1 & 2.</p> <p>Question 8-h Section B asks if there are classified “environmentally sensitive”: areas in this landscape. WDFW’s definition of “Priority Habitat” does not meet the threshold of “environmentally sensitive” – therefore WDFW’s answer once again is designed to exaggerate the status of this landscape not only to promulgate this closure but to set the stage for future closures as well. These species have co-existed comfortably in this landscape for decades with or without this project winter closure.</p> <p>8-L Section B —this proposal is not consistent with the plan being formulated with the Naneum to Columbia Recreation Plan because this project eliminates traditional motorized recreation. There is no evidence that WDFW has engaged with the DNR to resolve this conflict in management even though they are “partners” in the N/C Recreation Planning process. Therefore, there is no compatibility and this closure project should be voided. Additionally, WDFW appears to acknowledge that they have a responsibility to mandates. We want to remind them that this includes legislative mandates. (i.e. 2013 House Bill 1112 RCW 34.05 new section 1 & 2 and the 2013 Legislative Capital Budget Proviso that protects traditional motorized access to this landscape.)</p> <p>The response WDFW provides for Question 12-c Section B is false. The road described as “mitigation” does not need to be debated as to whether it is closed or open. It has been open and remains an open road.</p> <p>There is one fact looming around this proposed project that is difficult to comprehend and will prove to be problematic to WDFW as they attempt to promote this project:</p>	<p>Neither the checklist question, nor our response used the phrase “unacceptable decibel levels”. We simply stated that “Overall, motorized vehicle traffic would be reduced by this proposal because most roads, within the Whiskey Dick Winter Range, will be closed during February, March and April, 2014.”</p> <p>WDFW considers species and habitats that are on the Priority Habitats and Species (PHS) list to be environmentally sensitive. That is one of the major reasons that the PHS list was developed.</p> <p>WDFW will continue to participate with the Department of Natural Resources and the 15-member citizen’s advisory committee in the Naneum Ridge to Columbia River Recreation Plan process. Longer term decisions about the management of the winter range will be made as part of the ongoing Recreation Plan process, but since that process is incomplete, a short term decision for 2014 is required.</p> <p>This proposal is consistent with one of the two options that are still being considered for winter management in the Recreation Plan.</p> <p>We agree that there is no need to debate” the status of a road that isn’t proposed to change, but it is important to describe the status of that road since it occurs within the boundaries of the proposal.</p> <p>Policy 6012, Managing Public Access on Department Lands was adopted on February 29, 2012, but access management decisions that preceded the new policy were not required to</p>
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<p>In early 2012, WDFW promulgated Policy 6012- Managing Public Access on Public Lands. Although required, that policy was not activated for this (Whiskey Dick Winter Elk) closure in 2013 by way of the SEPA process.</p> <p>Simultaneous with this closure, already scheduled for starting on February 1, 2014, the following Winter Elk Closures, restricting motorized vehicles have already started without a SEPA process that is required in Policy 6012.</p> <ol style="list-style-type: none"> 1. Joe Watt Canyon 2. Robinson Canyon 3. Oak Creek Game Range 4. Wenas Game Range <p>WDFW in Region 3 ignored the above areas because their tunnel vision focus is to close as many roads as possible in the Whiskey Dick, Quilomene, Colockum with every intent to defy the wishes of the public, local elected, the Legislature and without providing full disclosure to the WDFW Administration while side-swiping the WDFW Director. For WDFW in Region 3, it's not about what is best for elk or the spirit of obtaining public input via policy 6012, it is all about ruling-over and restricting traditional motorized recreational access --period. Road closure proposals in Region 3 are straight forward attacks on KCFSC, citizens, Kittitas County Commission and the Legislature because we all oppose road closures and this project is a signature example of WDFW's Region 3 Road Closing agenda. Five separate SEPA's should be in process simultaneous and WDFW Wildlife Area Managers in Region 3 need to explain why they are not. All of the other four Elk Wintering areas need to be re-opened immediately for motorized recreational access. The very nature of this inconsistency and hypocrisy in policy management by Region 3 should diminish the level of acceptability this project receives from anyone----especially WDFW management. This issue needs to be dealt with so we can avoid having to deal with an expanded challenge.</p> <p>The Wenatchee Sportsmen's Association is in favor of an expanded version of this winter Elk Closure. This is because WSA is also in favor of impeding the tribal hunting rights of the Yakama Nation to hunt big game in this landscape. Leadership of the WSA stated at an Elk Winter Closure public meeting in Ellensburg in January 2013 that the WDFW Fish and Wildlife Commission had asked them to write a letter (to "All Washington Hunters" and the press) supporting the closing of roads to impede tribal hunting. This statement was made in front of 150 witnesses including high ranking WDFW officials and two WDFW Commissioners. WDFW has endorsed</p>	<p>be processed retroactively. Therefore, the 4 winter closure areas listed, which existed for many years before the policy was written, and many other access management actions around the state, were grandfathered in under the new policy.</p> <p>WDFW welcomes all comments and suggestions but has made no statement of endorsement or adoption of the Wenatchee</p>
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<p>the WSA agenda to impede tribal hunting by following the WSA's road closing template. WDFW has not provided proven science for this winter Elk closure. Therefore, a logical conclusion would be to assume that WDFW is following the direction given to them by the WDFW Commission to impede tribal hunting. When the tribes' access is impeded so is the publics' and we are not okay with that. This project SEPA needs to be removed from consideration immediately.</p>	<p>Sportsmen's Association letter.</p> <p>The current proposal would not prohibit tribal hunting.</p> <p>The effects of roads on elk have been studied for decades, and Dr. Scott McCorquodale, WDFW's Deer and Elk Specialist, summarized the results of over 50 years of studies. Dr. McCorquodale's paper, "A Brief Review of the Scientific Literature on Elk, Roads, & Traffic", can be found on line at http://wdfw.wa.gov/publications/01491/. No scientific evidence has been submitted, through this SEPA process, to refute the conclusions of Dr. McCorquodale's literature review.</p>
<p>Gerald/Joyce Pfluger We wish to register and confirm that we are in support of the current closure of the roads in the Whiskey Dick Areas of the Colockum area. We heartedly support WDFW in protecting the elk in their habitat.</p>	<p>Thank you for your support.</p>
<p>Gia Cummisk Please keep the road closures in place for the calving elk. This has been proven effective.</p>	<p>Thank you for your support.</p> <p>This proposal is more about elk disturbance, displacement and agricultural conflicts during late winter and early spring than about calving. The condition of the cows, during winter and spring, can also influence their productivity, so there is a connection with calving.</p>
<p>Gloria/Jeb Baldi Please consider this our response to the DNS for the Whiskey Dick Winter Range—Seasonal Motor Vehicle Closure. Although the report recommends opening the road from February 1st to April 30th, the evidence stated in the SEPA Checklist does not support that decision. Conversely, it appears the road should be closed during that period. Regarding the SEPA checklist, the following statements do not support opening the road:</p> <ol style="list-style-type: none"> 1. "The overwhelming majority of hunters (74% to 84%) support, or strongly support, using road closures to maintain healthy game populations during critical times of the year." 2. "From the 2008-2012 Colockum Elk Study, data indicated that with eliminating motorized traffic, elk became less sensitive to road proximity." (We assume this means the elk are less disturbed.) 3. Dr. McCorquodale's study also "clearly demonstrated that wintering elk in this region are in marginal physical condition during mid-to-late winter period." He also wrote that "The scientific evidence is compelling that disturbance associated with traffic on open roads can strongly affect elk distribution and limit use of even highly preferred habitat near roads". <p>The area in question was purchased for the purpose of winter range for game and bird habitat. Prior to 2008 some roads were left open and more elk were reported as problems on private agricultural lands. Since the closure of roads in the last five years, elk problems have decreased. This would indicate the opening of roads will again make the problem</p>	<p>Thank you for your support.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>We agree with your major points and believe that they support this proposal to close the majority of the roads within the Whiskey Dick Wildlife Area to motor vehicles during February-April 2014.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The</p>

<p>worse by forcing elk to the west.</p> <p>Other statements in the SEPA regard the physical status of elk when disturbed. Less body fat and less reserves for the calving season are indicated, which would be another reason for keeping the road closed during the February through April period. It appears the physical status alone could indicate the area roads should be closed earlier, such as November 1st or December 1st. The SEPA does state that this is the shortest closure compared to other states, so an extended closed period is worth considering.</p> <p>Another huge concern is the three-mile access through Ginkgo State Park lands. Because of the lack of funding and the shortage of State Parks staff, the monitoring of the gate will be almost impossible. Therefore, the State Parks land and roads will also be negatively affected with traffic wear on moist roads. State Park gates will have to be perpetually open if they do not have the staff to be gate keepers?</p> <p>The SEPA mentions creeks and tributaries, wetlands, steep slopes, and roads with increased usage, all of which are likely to suffer negative consequences. From experience we know that very little moisture can cause muddy situations that help destroy roads surfaces. To protect the natural resources, the game, and the habitat, plus lessen future maintenance of roads, the area should be closed a minimum of three months. Again, it appears it would be more beneficial for elk and resources if roads in this area were closed no later than December 1st of each year!</p> <p>The Whiskey Dick Winter Range has been closed to motorized vehicles since 2008, and decisions are presently being made for the soon-to-be released Naneum Ridge to Columbia River Recreation Plan. The SEPA does not support opening the area, and WDFW does not appear to have funds to enforce proper use or monitor the area, nor to improve the roads from damage caused by more usage during wet weather. Please consider closure this year until a permanent plan is developed!</p>	<p>route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>Typical management of the gate at Ginkgo State Park is for the gate to remain closed and locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal.</p> <p>Closure of most roads within the central portion of the Whiskey Dick Wildlife Area during February-April would help reduce the impact of motorized vehicle use on wet roads.</p> <p>The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>Gloria Lindstrom</p> <p>The current WDFW's Whiskey Dick winter motorized vehicle restriction has had a positive effect on elk for numerous winters. It has been a good thing so why make any changes that would negate this positive effect?</p> <p>The description of the proposal is to restrict the use of motor vehicles within portions of the Whiskey Dick Winter Range which sounds good and then half way down the paragraph it says, except for a single road. It continues to state the intent is to provide increased protection and security for wintering big game and continues to provide facts that elk and motorized traffic don't work. This makes no sense.</p> <p>The proposal further contradicts the effects of roads on elk movements that have been studied for decades. Scott McCorquodale, WDFW's Deer and Elk Specialist, in 2013, summarized the results of numerous studies that road effect</p>	<p>Thank you for your support.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is</p>

<p>on large mammals were predominately negative. This proposal will have a negative effect on the elk, the road, and the resource.</p> <ol style="list-style-type: none"> 1. This is the winter range for the elk. The ability of noisy vehicles to go anywhere on or off the roads (which they do with frequency) creates added stress to the elk during the winter season. No one is there to monitor the usage. 2. The proposed road passes across terrain that is classified as low suitability and passes adjacent to a stream potentially degrading a sensitive area. 3. The 2013 Tarp Fire has decreased forage for the elk which will likely promote more movement south. They don't need added stress. 4. Numbers of elk have increased and they are wandering to private farm lands in search of feed. Road noise in their winter range may create a greater problem. 5. Road opening in the winter may create more vandalism to public and private property. Opening the road to motorized recreationalists makes no sense when keeping the road closed has worked. There are numerous other roads available to them. If it is shed they are after, they can hike into the area. <p>How can WDFW determine that this proposal will likely not have a significant adverse impact on the environment and therefore state law does not require an EIS? No mention is made of the adverse effect on the wildlife that inhabit the area! And why would WDFW provide so little time and during a busy Holiday Season for public response to open the road from north to south along the eastern border of Whiskey Dick?</p> <p>Please do not set precedence for opening roads into wildlife habitat during winter. Instead establish a precedence to make winter closure time in the Whiskey Dick Winter Range at least five months long beginning December 1st through April 30th. Protect the environment and the wildlife!</p>	<p>required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>Closure of most roads within the central portion of the Whiskey Dick Wildlife Area during February-April and would help reduce the impact of motorized vehicle use on wet roads.</p> <p>The roads that are proposed for seasonal closure also fit this description, so their closure for 3 months will help address these impacts.</p> <p>During 2013, the Colockum Tarps fire burned approximately two thirds of the Colockum winter range and produced more uncertainty about elk distribution for this winter. However, most of the area within the proposed winter range closure was south of the fire and retained more forage. This temporary forage condition supports this proposal to close most roads within the Whiskey Dick Wildlife Area.</p> <p>Over the past 10 years, the total Colockum elk population has increased by over 2000 animals, while damage claims have been decreasing.</p> <p>This proposal is not to open a road, but to close most roads that are currently open within the Whiskey Dick Wildlife Area during February-April, 2014.</p> <p>The timing of the comment window was not calculated to reduce public review or participation. WDFW extended the standard 14-day comment period by seven days to provide more public review and participation in light of the timing falling during the holiday season. WDFW decided not to further extend the review process because a decision must be made prior to the proposed implementation date of February 1st. Comment noted.</p>
<p>Gordon Goodwin This area is proven to be the winter range for a major part of the Colockum elk herd, any human activity has a negative impact on these animals. In the past, because of motorized traffic and human presence in the area, elk have swam across the Columbia River to the Douglas and Grant county side of the river and caused problems for orchardists, ranchers, and</p>	<p>Thank you for your support.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of</p>

<p>traffic mishaps on the state and other highways. This area should be closed to all traffic in the winter months.</p>	<p>motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>Hal Lindstrom</p> <p>One of the most confounding actions I've seen during years of involvement in public land-use issues is this one by the WA DFW to open the Whiskey Dick Winter Closure Area to motorized travel. The word "Confounding" has among its synonyms the words: surprise, bewilder, baffle, perplex, confuse, and dumfound - all can be appropriately applied to the Department's proposal.</p> <p>A companion to the Department's proposal is the misleading first sentence in the DNS that begins with: "The proposal is to restrict the use of motor vehicles within portions.....etc."</p> <p>Wording that would agree with the DNS intent would more accurately read : The proposal is to liberalize the current winter-closure policy in order to allow.....etc."</p> <p>It defies logic to read the bulk of the Department's DNS that details all the good scientifically-supported reasons for instituting the winter closure plus the follow-up assessments that corroborate the decision, and then proceeds to go in a contrary direction to advocate opening a key road in the winter closure area to vehicular travel. It's not fair to limit the projected limited impact to the road bed. Analysis has shown that more than 50% of motorized recreationists admit to travelling off road.</p> <p>I'm aware from years of involvement with the USFS on land-use issues related to passage of the Alpine Lakes Management Plan in 1976 that immediately created a near four hundred thousand acre Alpine Lakes Wilderness and a more than five hundred thousand acre surrounding Management Unit where all the controversies lie, that there's a difference between what people in the field think and feel with that of people in the higher echelons of the organization. On environmentally-related issues where research is more meaningfully and intimately a part of what they do, field people can differ significantly with what finally becomes 'company policy'. I think that must be the situation with respect to this DNS – it seems inconceivable to me that DFW people in the field would be in support of this DNS.</p> <p>This proposal is so disappointing. My personal feeling is of course irrelevant if I'm the only one to feel this way. If it's significantly more widely held, a decision to open the winter-closure area to vehicular traffic could do the WDFW considerable harm.</p> <p>I close by directing decision makers to the specific comments presented by Kittitas Audubon Society of which I'm a member.</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p>

<p>Herb Troxel</p> <p>“WDFW’s mandate is to preserve, protect and perpetuate fish, wildlife and their habitats, and to maximize sustainable wildlife-related recreation. The Colockum, Quilomene and Whiskey Dick Wildlife Areas were purchased specifically to provide big game winter range and upland game bird habitat, and also to provide diverse wildlife-related recreational opportunities such as hunting, fishing and wildlife viewing.” I strongly support the closing of wintering areas to protect wildlife. I do not understand why a road would be left open through the middle of the area. I understand many people like to watch wildlife, as I do. If you are going to allow wildlife viewing on the winter range, why not do it on the periphery of the area? Maybe allow it in areas wildlife traverses to reach agricultural areas. This would tend to move them back into the areas where they belong. The Colockum Tarps fire burned a large percentage of the winter range. This is a poor year to put additional pressure on game. The low snowpack this winter makes it easier on the elk, but is also increases access to roads in the area. One of the major problems with vehicular use in the Whiskey Dick (or any other area) is travel beyond the closed signs due to ineffective enforcement. This travel would increase pressure on the elk to disperse to other areas.</p> <p>If you are planning a use (wildlife viewing in the heart of the area) that will make the elk disperse I do not believe you can justify a finding of insignificance. Vehicle-elk collisions on I-90 and around Quincy, agricultural depredations, WDFW damage compensation costs, herd health reductions, and reduced recreational hunting opportunities are a few negative impacts I can think of. Of course damage to roads with resultant costs and increased siltation of waterways would also be a negative impact.</p>	<p>We agree with your presentation of WDFW’s mandate and management objectives for the LT Murray Wildlife Area.</p> <p>Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>This proposal is to close most of the roads within the Whiskey Dick Wildlife Area, so the enforcement emphasis would be to ensure that the public understands and complies with the temporary closures during February-April, 2014. Under the proposed temporary closure, the miles of open roads that would need to be patrolled would be reduced from the current condition.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p>
<p>Janet Burcham</p> <p>My first comment is the calculated timing and extremely short public comment period for this predetermined “Determination of Nonsignificance”. This SEPA was released during the Christmas holidays and spans only 2 weeks for public comment, covering not only Christmas but New Year’s holidays. How convenient for the WDFW staff that wishes to prevent or limit public opposition to this negligent and rash proposal that will have adverse environmental impacts. What is the rush to have a decision made on the continuation of the winter range closure before Feb. 1 when the closure can be continued as it has been done for the last 5 years until the “Naneum Ridge to Columbia River Recreation Plan” is completed in mid-2014? Could one reason be that numerous comments have already been received on the Recreation Plan</p>	<p>The timing of the comment window was not calculated to reduce public review or participation. WDFW extended the standard 14-day comment period by seven days to provide more public review and participation in light of the timing falling during the holiday season. WDFW decided not to further extend the review process because a decision must be made prior to the proposed implementation date of February 1st.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of</p>

<p>supporting continued closure of all roads from Feb. 1 to April 30 in the winter range to motorized access? Organizations and groups such as Kittitas Audubon, Central Washington Native Plant Society, Wenatchee Sportsmen's Association, Black Hills Audubon, and numerous individuals have submitted comments to the public record supporting continuation of the winter range closure to motorized access. I speculate that this current proposal to change the status quo is purely a political decision. There is no compelling reason or justification given in the SEPA summary or Checklist to change the current closure management strategy. The evidence for a political rather than scientific reason is clear in the complete disregard of the science and facts supporting road closures during winter as described in the SEPA Checklist. They are as follows:</p> <ol style="list-style-type: none"> 1) Research by WDFW field staff of the Colockum elk herd (2008-2012) that tracked movements of elk and their use of the winter range documented that elk became less sensitive to road proximity after motorized access was prohibited. 2) McCorquodale's published paper (2013) summarizes his and other researchers' work that open roads strongly affect elk distribution and negatively impact their energy reserves during a period of high environmental stress (winter). His summary of the Colockum Elk Study was that the data show that wintering elk in this region are in marginal physical condition in the mid-to-late winter period. 3) Implementation of the seasonal motorized vehicle restriction as part of a combination of management actions has resulted in a decrease of complaints from private landowners about damage by elk. 4) There will be continued and increased erosion on the very rough, primitive road if driving is allowed during the wet months of winter. 5) The results from a public opinion survey contracted by WDFW (2008) documented that an overwhelming majority of all types of hunters (74% to 84%) strongly support road closures to maintain healthy game populations during critical periods. <p>Opening the road through the winter range and down to the Ginkgo State Park will cause disturbance and harassment of elk, deer, and possibly bighorn sheep in direct contradiction to the purpose of the winter range.</p> <p>In addition, this proposal requires another agency, Washington State Parks, to change its own management actions and policies regarding closed roads through Ginkgo State Park land. For WDFW to propose unilaterally what another agency must do to meet the needs of this proposed action is arrogant and inconsiderate. Washington State Parks is struggling to operate under severely reduced budgets. Ginkgo State Park has only one ranger to cover 3 parks during the winter period and no staff or resources for regular monitoring and enforcement to prevent theft and vandalizing of petrified wood and cultural resources or protect habitat. Closing or limiting access to the road through State Park lands only to private landowner(s) on the Columbia River is the best, and perhaps only, management option under current budget constraints.</p> <p>According to the SEPA Checklist, proposed measures to reduce or control transportation impacts will necessitate</p>	<p>motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>We agree with your interpretation and presentation of WDFW's management objectives for the LT Murray Wildlife Area and your summary of the information that we have provided regarding Colockum elk and the Whiskey Dick winter range. Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.</p> <p>This is true of all of the open roads within the Whiskey Dick winter range and supports our proposal to close the majority of those roads during the February-April period.</p> <p>The road in question is currently open and this proposal would not change that management, but would temporarily close the other roads within the Whiskey Dick winter range.</p> <p>Typical management of the gate at Ginkgo State Park is for the gate to remain closed but locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal.</p> <p>This proposal is to close most of the roads within the Whiskey Dick Wildlife Area, so the enforcement emphasis would be to ensure that the public understands and complies with the</p>
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<p>increased enforcement presence. What is the likelihood of this happening? Where are the resources and staff at WDFW to do this monitoring at an effective level on a regular, continuous, and consistent basis? How many enforcement officers does WDFW have here, and what is the size of territory that each must now cover? Is the current or projected budget sufficient to cover this increased enforcement presence? There is no such monitoring now of the access beyond the voluntary closure sign, but it is known that this sign is ignored even now. None of these questions are addressed in the Checklist. Simply writing that there will be enforcement associated with this proposal to open a road continuously through the winter range to motorized access does not make it so. Increased monitoring and enforcement presence is even less likely for the Gingko State Park as described previously.</p> <p>“Recreational driving” is new language and an added afterthought to informal recreational opportunities WDFW includes in the objectives for this and other wildlife areas. This has not been included as a form of recreational opportunity in the wording of WDFW’s mandate to maximize sustainable wildlife-related recreation until this proposal. For many, “recreational driving” takes the form of driving off-road creating deep ruts and deliberately “mudding” their vehicles. Or they drive off-road up steep slopes or across untracked meadows or fragile lithosol areas to test the virility of their vehicles. Do not pretend that “recreational driving” is a benign term and action with a universally understood interpretation. Do not assume that this destructive type of driving won’t happen on the winter range.</p> <p>The winter range closure to motorized access is VERY SHORT, and will not result in any motorized user, including the Essmans, curling up and dying during those 3 months of closure. Non-motorized access to the area is still permitted, including walking and horse riding. I support maintaining the closure to motorized access for the entire area of the winter range as has been done for the previous 5 years. It is even more important to continue the closure to motorized vehicles over the entire winter range now due to the recent fires in the Colockum-Tarps and Table Mountain areas that have reduced forage.</p> <p>This proposal to alter the management of the winter range from complete closure to motorized access to allow one road through the middle of the winter range to be continuously open to motorized vehicles is inconsistent with the science that has been contracted by and conducted by WDFW. The proposed action of opening one road through the winter range and down to the Gingko State Park is not supported by the facts. There is no explanation or justification anywhere in the SEPA summary or Checklist that supports or provides a compelling rationale for opening the road through the middle of the winter range area to motorized traffic from Feb. 1 to April 30.</p> <p>The “Determination of Nonsignificance” is contrary to the facts presented in the SEPA Checklist. Concluding a “determination of nonsignificance” through this SEPA process without a genuine review and consideration of facts as the SEPA process requires is a mockery. This SEPA must conclude</p>	<p>temporary closures during February-April, 2014. The miles of open roads that would need to be patrolled would be reduced from the current condition.</p> <p>This proposal does not open any additional roads, but it would temporarily close most of the roads within the Whiskey Dick Wildlife Area. If we withdrew this proposal and DNS, all roads within the Whiskey Dick Wildlife Area that are open May-January would remain open during February-April, increasing impacts and the need for additional enforcement presence.</p> <p>The phrase “recreational driving” is not a technical term, but just a practical description of a common activity that is very popular on WDFW wildlife areas and other public lands. Off-road driving activities also can and do occur, but they are not legal on Wildlife Areas. This proposed seasonal closure of most roads within the Whiskey Dick would reduce opportunities for these types of violations during February-April 2014.</p> <p>Comment noted.</p> <p>During 2013, the Colockum Tarps fire burned approximately two thirds of the Colockum winter range and produced more uncertainty about elk distribution for this winter. However, most of the area within the proposed winter range closure was south of the fire and retained more forage. This temporary forage condition supports this proposal to close most roads within the Whiskey Dick Wildlife Area.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife</p>
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<p>a "Determination of Significant for Adverse Impact on the Environment".</p> <p>I wonder why WDFW would spend so much time, effort, and money on research and implementation of management strategies that are based in sound science to simply override that with a political decision. Why would WDFW not support the efforts of the field staff that conducted that research and work hard to meet the mandates of the agency through best management practices? Why would WDFW be willing to alienate organizations and the public that support the agency's goals and mandate to make wildlife and habitat protection a priority for the benefit of current and future generations? The agency's credibility and future support are at risk with this proposal.</p>	<p>resources while providing compatible recreational opportunities. The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were also intended to achieve that balance.</p> <p>WDFW will continue to participate in the Naneum Ridge to Columbia River Recreation Plan process and longer term decisions about management of the winter range will be included within that process.</p>
<p>Jerry Gutzwiler</p> <p>Seasonal closure of this area is not only a good idea to protect elk, deer, big horn sheep and other wildlife during the winter months, it's not recommended to be closed for a long enough time. It should be closed from the end of December to at least 1 April each year to minimize disturbance and harassment of wildlife during this annual period of environmental stress that comes with cold, snow and lack of good forage. This property was purchased by DFW in the 2007-2008 time frame to provide undisturbed winter habitat for these animals so that they would not migrate to private fields and pastures in Kittitas County where they were causing a lot of damage. Leave this area undisturbed by any motorized vehicles for at least four months each winter otherwise there will be more wildlife problems in agricultural areas of Kittitas, Grant and Chelan Counties. They need a place to over winter and not be disturbed by humans and the Whiskey Dick and Colockum Areas are the best habitat for that.</p> <p>I agree that the Whiskey Dick Wildlife area should be closed to all motorized vehicle in the winter.</p> <p>The closure needs to be lengthened so that animals migrating into the wintering area won't be harassed or diverted. The closure should be imposed by year end.</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>Some portions of the property under this proposal were acquired as part of the Skookumchuck acquisition in 2007, but the majority of the Whiskey Dick Wildlife Area was acquired during the 1960s, primarily for big game winter range.</p> <p>Thanks for your support.</p> <p>Comment noted.</p>
<p>Jim Charlton</p> <p>I would like to express my support for a seasonal road closure in the Whiskey Dick area. I believe the only way to insure good winter range for wildlife in this area is to close all roads to motor vehicles during the critical winter months. This method of securing winter range for wildlife has been used in other western states with good success. The efforts to improve elk herd structure have had the desired results, but with wintering areas open, additional pressure from poaching, tribal harvest, and simple disturbance have diminished the</p>	<p>Thanks for your support.</p>

effectiveness of regulating mature bull harvest.	
Joe Greenhaw You have my full support on the closure however I feel that as an ongoing closure it should close by Dec 10th of each year. What you have proposed is too late in the year.	Thanks for your support. Comment noted.
John Chappell I am writing in support of the seasonal road closures at the 2013 level for the Whiskey Dick Area for 2014 and beyond. These closures reduce winter disturbance of wildlife when they are most vulnerable. With increasing human population pressure this disturbance gets worse each year. I have seen that this has been going on for decades and the state needs to protect wildlife from these disturbances. The closures also are useful in reducing movement to agricultural areas which helps our farmers.	Thanks for your support.
Karen Raymond I am writing in response to the Determination of Nonsignificance for the road closure through the Whiskey Dick Wildlife Area. Restricting motorized vehicles from February through April to preserve winter elk range is supported by the research and in keeping with the mission of the WDFW. However, why allow the road through Ginkgo State Park up to Quilomene Ridge to be open? The road is currently gated at Recreation Road and should remain closed for the following reasons: 1) State parks does not have staff to patrol the road and prevent damage during this wet period (the park is not even open to the public during the winter). 2) The road is used heavily by Ellensburg residents for hiking in the late winter-early spring time period, and having the road open to motorized vehicles would curtail this activity. 3) No reasons were stated as to why motorized use of this road would not impact winter elk habitat.	Thanks for your support. The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo. Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process. Typical management of the gate at Ginkgo State Park is for the gate to remain closed but locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal. Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.
Kay Forsythe I'm writing to comment on the Whiskey Dick Wildlife Area Seasonal Road Closure. For the last 5 years that area has been closed from Feb 1 through April. I support maintaining	The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through

<p>that closure. My husband, my friends and I have hiked in that area. Your own science supports leaving it as is, with this 3 month closure.</p> <p>This is a substandard road, already affecting the land adversely. Increased usage in the months of weather with spring melt and freezing nights is asking for more problems with mudding, dirtying the streams, destroying fish habitat, and harming native plant populations.</p> <p>Elk, according to your study, are at their most fragile state Feb-April; their increased movement due to motorized use is hard on them. The closure has provided them a calm environment in the wild, a refuge away from the ranchers who understandably don't want them.</p> <p>In 2008 a public survey by WDFW showed that most hunters really do support road closures to maintain a herd of healthy elk. Foot traffic, hiking or horsing, is still allowed.</p> <p>Ginkgo State Park is included in this proposal to the tune of 3 miles. That's lots of land for them to be monitoring. Their funding and staff is currently stretched to do their job; they would hardly be able to protect the resources on this land - be they elk, archaeological or petrified wood – much less maintain the road.</p> <p>Your own science contradicts this winter road opening. The SEPA checklist gives the facts that support your Feb 1 through April closure (as it has been for the last 5 years). Who knows what will happen when the whole big overall plan is decided on? In the meantime, you guys should be ashamed to put out this SEPA during the Christmas holiday break!! Many who care will not have had the opportunity to see it.</p> <p>Many folks are aging - I'm over 65. As we do so, we need to graciously admit that we can no longer visit certain places because we're physically unable to do so. We cannot road the world and continue to develop areas in order to give people access. The natural world needs space and time to be natural.</p>	<p>January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.</p> <p>Typical management of the gate at Ginkgo State Park is for the gate to remain closed but locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal.</p> <p>WDFW will continue to participate in the Naneum Ridge to Columbia River Recreation Plan process and longer term decisions about management of the winter range will be included within that process.</p> <p>The timing of the comment window was not calculated to reduce public review or participation. WDFW extended the standard 14-day comment period by seven days to provide more public review and participation in light of the timing falling during the holiday season. WDFW decided not to further extend the review process because a decision must be made prior to the proposed implementation date of February 1st.</p> <p>Comment noted.</p>
<p>Jim Briggs – Kittitas Audubon</p> <p>Kittitas Audubon submits the following comments on the DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE. Previously, Kittitas Audubon submitted comments to the Naneum Ridge to Columbia River Recreation Plan of which the Whiskey Dick Wildlife Area is a part. In those comments, Kittitas Audubon expressed support for maintaining the closure of the Whiskey Dick winter range to motorized access from Feb. 1 to April 30. We would like to reiterate that position in the comments submitted to this SEPA.</p> <p>The proposal for changing the closure to motorized access on all roads in the winter range to opening one through road from the Quilomene Ridge Road to Ginkgo State Park is not justified by the accompanying SEPA Checklist. Neither is a persuasive rationale provided in the summary or Checklist why this road should be opened during the closure to motorized access now as a change from the management action of the last five years.</p>	<p>WDFW will continue to participate in the Naneum Ridge to Columbia River Recreation Plan process. Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife</p>

<p>The Checklist does, however, provide clear evidence and support based on science why motorized access on roads in the winter range should be prohibited during Feb. 1 through April 30. To highlight the science-based information in the Checklist:1) WDFW personnel have conducted a multi-year study of elk movements by tracking collared elk and determined the use of the winter range and migration patterns to and from it. The winter range provides a low elevation, relatively snow-free area for forage habitat for elk that are now excluded by agriculture and development from former winter range in the valley bottom.</p> <p>2) WDFW's own elk and deer specialist, Dr. Scott McCorquodale, concluded from the data on elk condition from the multi-year study that the Colockum and Yakima elk were in marginal physical condition in mid to late winter, coinciding with the Feb. 1 to April 30 closure to motorized access. He also reviewed the published scientific research on the response of elk associated to traffic on open roads. Some of those studies found that elk altered their habitat use in response to the disturbance from motorized use of roads and determined the distances to which elk moved away from roads. During critical winter months when forage is scarce and body condition of the Colockum elk is marginal as Dr. McCorquodale concluded, the elk will be unnecessarily stressed and expend energy reserves to move away from a road open through the winter range.</p> <p>3) Conversely, the multi-year study by WDFW field staff of the Colockum elk herd (2008-2012) showed that elk became less sensitive to road proximity after motorized access was prohibited. Currently, the seasonal restriction of motorized vehicles from Feb. 1 to April 30 on the winter range combined with other management strategies have resulted in decreased numbers of complaints from private landowners about elk damage to hay and crops. This result demonstrates the effectiveness of this management strategy that benefits local landowners as it was intended.</p> <p>4) Furthermore, WDFW contracted a public opinion survey in 2008 that showed that a majority of hunters (74% to 84%) strongly support road closures during critical periods to maintain healthy game populations. In fact, the closure implemented on the Whiskey Dick winter range is very short compared to other closure areas and is only a closure to motorized access—walking and horse riding is not restricted during the closure period as it is on other winter closure areas.</p> <p>A disturbing element of this proposal to open a through road</p>	<p>Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>We concur that the proposed temporary closure of roads in the winter range is supported by information in the checklist and in the literature.</p> <p>We agree with your interpretation and presentation of WDFW's management objectives for the LT Murray Wildlife Area and your summary of the information that we have provided regarding Colockum elk and the Whiskey Dick Wildlife Area. Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>This response to motorized vehicles, which is well documented in scientific literature, was observed (though not tested statistically) during the Colockum Elk Study.</p> <p>We concur that the proposed temporary closure of roads in the winter range is supported by information in the checklist and in the literature.</p> <p>This proposal does not open any additional roads, but it would</p>
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<p>is the inclusion of a stretch of almost three miles of road through Ginkgo State Park lands. This would appear to require some acknowledgement in the SEPA that State Parks has agreed to this action. Recognizing that Washington State Parks is operating under severe budget constraints, requiring the Park to open a road that currently has a locked gate is an imposition and lacks consideration of that agency's management policies. There are archaeological resources as well as petrified wood at Ginkgo State Park in the area along the road that are vulnerable to theft or damage. Washington State Parks is understaffed and underfunded for monitoring and protecting those resources, particularly during the winter. Keeping the road closed to all but permit holders and administrative use may be the only means the Park has to ensure that protection at this time.</p> <p>Monitoring and enforcement capability by WDFW is addressed inadequately in the SEPA for the proposed open road as well. It is known from the multi-year Colockum elk study that the voluntary road closures during the Feb. 1 to April 30 are ignored now by some drivers and would be so for the road to be opened by this proposal. The SEPA does not identify new funding and increased enforcement staff and monitoring frequency that would be required to implement the closure.</p> <p>The degradation of terrestrial and aquatic habitats due to erosion and widening of the road bed from driving on this primitive, nonstandard road during the wet months of the year may conflict with the Habitat Conservation Plan (HCP) objectives for listed species in the area that WDFW is developing with the U.S. Fish and Wildlife Service (USFWS). The SEPA summary and Checklist make no mention of the restrictions that the USFWS may require on management actions that may preclude continuous use of this road. The "Determination of Nonsignificance" made in this SEPA is inconsistent with and contradicted by the facts and science presented in the SEPA Checklist. No compelling rationale or justification for opening a through road from the Quilomene Ridge Road to Ginkgo State Park during the winter closure from Feb. 1 to April 30 is provided in the SEPA summary or Checklist. The SEPA Checklist does provide the facts and science that support maintaining the closure to all motorized access on the Whiskey Dick winter range over its entire area for the period from Feb. 1 to April 30 as has been done for the last five years. No change from that strategy is warranted or supported.</p> <p>Finally, it is worth commenting that the posting of this SEPA over an extended holiday period is likely to limit comments, some which might oppose the determination of nonsignificance. Since the overall Naneum Ridge to Columbia River Recreation Plan is also addressing the winter range options and scheduled to conclude by summer 2014, it seems contrived to rush to establish a different management strategy for this season.</p>	<p>temporarily close most of the roads within the Whiskey Dick Wildlife Area.</p> <p>Typical management of the gate at Ginkgo State Park is for the gate to remain closed but locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal.</p> <p>This proposal is to close most of the roads within the Whiskey Dick Wildlife Area, so the enforcement emphasis would be to ensure that the public understands and complies with the seasonal closures during February-April, 2014. The miles of open roads that would need to be patrolled would be reduced from the current condition.</p> <p>Car counter data that was collected in connection with the Colockum Elk Study actually indicated that compliance with the former winter closures was good.</p> <p>WDFW is working with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service to develop a Habitat Conservation Plan for the management of WDFW lands. The HCP is still in draft form and will not be adopted before the term of this proposed temporary road closure has ended in May.</p> <p>The proposal is not to open a road but to close the majority of roads in the Whiskey Dick Wildlife Area.</p> <p>The timing of the comment window was not calculated to reduce public review or participation. WDFW extended the standard 14-day comment period by seven days to provide more public review and participation in light of the timing falling during the holiday season. WDFW decided not to further extend the review process because a decision must be made prior to the proposed implementation date of February 1st.</p> <p>WDFW will continue to participate in the Naneum Ridge to Columbia River Recreation Plan process. Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete,</p>
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<p>The closure can and should be maintained as it has been for the previous five years. There may or may not be a different management strategy when the Recreation Plan concludes.</p> <p>Kittitas Audubon would like to reiterate once more our support for prohibiting motorized access to all roads in the Whiskey Dick winter range from Feb. 1 to April 30.</p>	<p>a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years are no longer in effect.</p> <p>Comment noted.</p>
<p>Kittitas Co. Commissioners – Jewell, Berndt, O'Brien</p> <p>Thank You for the opportunity to comment on the current SEPA document for Whisky Dick. This closure has been ongoing for several years and came to the attention of the Board of County Commissioners nearly a year ago. Following a meeting with some of the local Region staff there was apparently a decision to place this area into a current planning process with the Department of Natural Resources known as the "Naneum to Columbia" study. We have encouraged our local citizens to actively participate in this more global concept. This process is not yet completed, however there are some developing alternatives for presentation in the spring of 2014.</p> <p>It is surprising to see that WDFW has chosen to withdraw from the process that it chose to voluntarily enter and to pursue yet another "temporary" closure independent from the planning process and prior to any decisions on road management for this area.</p> <p>There are a number of concerns that present themselves to this proposal:</p> <p>Question 7 in the SEPA checklist; Has WDFW withdrawn from the formal process to pursue an agenda of previous years? If not how can a SEPA decision simply be timed to expire following a set period of time? SEPA decisions remain intact indefinitely unless there is a change in law or a new proposal comes forward. The concern here is that a DNS decision could be construed to be in effect beyond April of 2014. Or is this a "phase" of a larger project? This requires more disclosure.</p> <p>Question 10; There is a statement in this question that indicates that the proposed road to remain open will require permission from Washington State Parks to accept the responsibility to unlock a gate that currently blocks access to the road that your Agency proposes to have available to the recreating public. Has this been vetted through State Parks or will it be a literal "roadblock"? Will an additional SEPA be required by Washington State Parks before the road can be opened?</p> <p>Land and Shoreline; There is an indication that both the Department of Natural Resources and BLM have land and</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>The current SEPA process is for a proposed action during February-April, 2014. Once the Recreation Plan is completed, another SEPA process will be completed for the entire planning area, including the portion of winter range found on the Whiskey Dick Wildlife Area.</p> <p>Typical management of the gate at Ginkgo State Park is for the gate to remain closed but locked with a combination which is readily available upon request. We would expect that pattern to continue under this proposal. Managers at State Parks have indicated that they can continue current practices through this spring, while also engaging in the Recreation Plan process to help determine and coordinate longer term management.</p> <p>WDFW has a long term management agreement for the U.S. Bureau of Land Management property that is within the</p>

<p>possibly roads that are included in the proposal. Have they been consulted and do they support the proposal and are they involved with this SEPA process?</p>	<p>Whiskey Dick Wildlife Area. Washington Department of Natural Resources also owns land within the area and they are well aware of this proposal through the Recreation Plan process.</p>
<p>Kittitas Co. Field and Stream Club – Deborah Essman</p> <p>The Kittitas County Field and Stream Club has reviewed DNS 13-082 regarding the Whiskey Dick Wildlife Area Seasonal Road Closure of 02/01/2014-04/30/2014. We are submitting the following response and questions.</p> <p>Issues:</p> <p>1. WDFW is separating this action from the overall recreation planning that is currently taking place for the larger piece of publicly owned land surrounding this area and for this area itself. The planning that is currently underway is for development of an overarching recreation management plan designed to guide recreation management decisions for the next twenty years plus on 230,000 acres of adjoining land managed by two Washington State agencies. While the DNS for the Whiskey Dick Wildlife Area Winter Closure could potentially have merit on its own, a DNS is absolutely not applicable to the larger recreation management plan currently being developed. This appears to be an attempt to segment the Whiskey Dick Wildlife Area Winter Closure from the larger action to avoid an in-depth review of this action. SEPA Section 2.3.1.1 states: "Phased review is not appropriate when it would merely divide a project to avoid consideration of cumulative impacts or alternatives. For example, if an industrial facility is proposed, it is not appropriate to limit the review to the impacts of the grade and fill permit without considering construction and operation of the industrial facility".</p> <p>2. Based on WAC 197-11-330 (3)(e)(iv) it appears that this action is likely to have a significant impact because it will establish a precedent for future actions that could potentially have significant effects (e.g. displacement of recreation resulting from an area closure). If recreation is shut down in one location, it will relocate -- what will it impact where it reestablishes? Also see WAC 197-11-330 (5) below.</p> <p>3. This is clearly a non-project action and it should be reviewed as one. The Environmental Checklist is incomplete.</p> <p>2.3.1.1 Phased Review</p> <p>The SEPA Rules allow a proposal to be phased so that SEPA compliance can be done for each phase. Phased review allows agencies and the public to focus on issues that are ready for decision and excludes from consideration issues already decided or not yet ready [WAC 197-11-060(5)(b)].</p> <p>The sequence of phased review of a project must be from a broad scope to a narrow scope. For example, the review of a multi-phase planned unit development would consist of a general review of the entire proposal and detailed review of those phases ready for construction. Additional review would occur prior to each future phase when adequate information</p>	<p>This temporary closure is a separate proposal from the long-term Recreation Plan that WDFW is developing with DNR. This is consistent with the checklist answer #7, which states: "this checklist is only for the temporary action."</p> <p>WDFW will continue to participate with the Department of Natural Resources in the Naneum Ridge to Columbia River Recreation Plan process.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>This proposal and the larger Naneum Ridge to Columbia River Recreation Plan are not dependent upon each other. This proposal can proceed during February-March, 2014 regardless of the outcome of the Recreation Plan and this proposed action does not limit the scope of the Recreation Plan.</p> <p>This proposal is only for a 3 month temporary closure to the use of motor vehicles in the project area and is independent from the larger Recreation Plan.</p> <p>This SEPA checklist is for a project action under WAC 197-11-704(2)(a). It is a decision on a specific project, with specific start and end dates, located within a defined geographical area.</p> <p>Proposals need to be analyzed together only if they "cannot or will not proceed unless the other proposals are implemented simultaneously with them" or "are interdependent parts of a larger proposal and depend on the larger proposal as their justification for their implementation." WAC 197-11-060(3)(b). Phased review would be appropriate if the proposals needed to be analyzed</p>

was available to evaluate the environmental impacts. Phased review is not appropriate when it would merely divide a project to avoid consideration of cumulative impacts or alternatives. For example, if an industrial facility is proposed, it is not appropriate to limit the review to the impacts of the grade and fill permit without considering construction and operation of the industrial facility.

The "broad to narrow" restriction of phased environmental review does not apply to planning proposals done under the Growth Management Act. For example, the environmental review for the adoption of an interim critical area ordinance (narrow focus) may occur before the review and adoption of the comprehensive plan (broad focus). This is allowed under the 1995 amendments to the SEPA Rules in WAC 197-11-228. Whenever phased review is used, the SEPA document must clearly state that the proposal is being phased. Future environmental documents should identify the previous documents and should focus on those issues not adequately addressed in the previous documents.

If the proposal consists of a series of actions that are individually exempt, but together may have a significant impact, then the proposal is not exempt.

WAC 197-11-330

Threshold determination process.

An EIS is required for proposals for legislation and other major actions significantly affecting the quality of the environment.

The lead agency decides whether an EIS is required in the threshold determination process, as described below.

(1) In making a threshold determination, the responsible official shall:

(a) Review the environmental checklist, if used:

(i) Independently evaluating the responses of any applicant and indicating the result of its evaluation in the DS, in the DNS, or on the checklist; and

(ii) Conducting its initial review of the environmental checklist and any supporting documents without requiring additional information from the applicant.

(b) Determine if the proposal is likely to have a probable significant adverse environmental impact, based on the proposed action, the information in the checklist (WAC 197-11-960), and any additional information furnished under WAC 197-11-335 and 197-11-350; and

(c) Consider mitigation measures which an agency or the applicant will implement as part of the proposal, including any mitigation measures required by development regulations, comprehensive plans, or other existing environmental rules or laws.

(2) In making a threshold determination, the responsible official should determine whether:

(a) All or part of the proposal, alternatives, or impacts have been analyzed in a previously prepared environmental document, which can be adopted or incorporated by reference (see Part Six).

(b) Environmental analysis would be more useful or appropriate in the future in which case, the agency shall commit to timely, subsequent environmental review, consistent with WAC 197-11-055 through 197-11-070 and Part

together. This is not the case here because the temporary closure decision needs to take place regardless of what the department ultimately decides for long-term management. The temporary closure and the long-term management decision can proceed regardless of whether the other one does, and the department does not need to rely on this temporary closure as justification for the long-term management decision, or vice versa.

WDFW does not believe that this proposal will have probable significant adverse environmental impacts.

Six.

(3) In determining an impact's significance (WAC 197-11-794), the responsible official shall take into account the following, that:

(a) The same proposal may have a significant adverse impact in one location but not in another location;

(b) The absolute quantitative effects of a proposal are also important, and may result in a significant adverse impact regardless of the nature of the existing environment;

(c) Several marginal impacts when considered together may result in a significant adverse impact;

(d) For some proposals, it may be impossible to forecast the environmental impacts with precision, often because some variables cannot be predicted or values cannot be quantified.

(e) A proposal may to a significant degree:

(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;

(ii) Adversely affect endangered or threatened species or their habitat;

(iii) Conflict with local, state, or federal laws or requirements for the protection of the environment; and

(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.

(4) If after following WAC 197-11-080 and 197-11-335 the lead agency reasonably believes that a proposal may have a significant adverse impact, an EIS is required.

(5) A threshold determination shall not balance whether the beneficial aspects of a proposal outweigh its adverse impacts, but rather, shall consider whether a proposal has any probable significant adverse environmental impacts under the rules stated in this section. For example, proposals designed to improve the environment, such as sewage treatment plants or pollution control requirements, may also have significant adverse environmental impacts.

[Statutory Authority: 1995 c 347 (ESHB 1724) and RCW 43.21C.110. WSR 97-21-030 (Order 95-16), § 197-11-330, filed 10/10/97, effective 11/10/97. Statutory Authority: RCW 43.21C.110. WSR 84-05-020 (Order DE 83-39), § 197-11-330, filed 2/10/84, effective 4/4/84.]

Questions:

1. Director Anderson stated at a meeting with Senator Holmquist Newbry and me on 05/23/2013 that the winter closure was not about herd health, but rather to address damage on agricultural land. Why then does the DNS refer to herd health as an objective and take up a major portion of this DNS?

On Page 3, Question 11 of the checklist, we stated "The intent is to provide increased protection and security for wintering big game (primarily elk) and reduce the displacement of elk to private properties to the west, while still continuing to provide the maximum recreational opportunities that are consistent with wildlife protection.

All aspects of an action are taken into account in the SEPA process. While WDFW has an obligation to address elk damage on private lands, there can also be benefits that further other agency goals of wildlife and habitat protection.

<p>2. How can you say there are “high levels of winter/spring traffic” when the total number for all four entry points, per your counters, was only 23 vehicles on January 30, 2013? (I halved your total as the counters did not take into account whether the vehicles were entering or exiting--and they had to come out somewhere).</p> <p>In a 44,000 acre area with large deep canyons and very primitive jeep trails (the word “roads” is a misnomer) the elk have very little contact with vehicles. If they are as disturbed by vehicles as stated, then why on March 19th 2013 (in the middle of the closure) were there hundreds of elk grazing and bedded down on the I-90 freeway median as thousands of vehicles drove by? The Washington State Patrol reported they had to close the freeway while WDFW hazed them north with a helicopter. This was not the only occurrence during the Winter Closure that large numbers of elk were encountered grazing along major highways.</p>	<p>Car counters document the number of times that a vehicle passes by a location. Each of these instances can disturb elk, whether it was the same vehicle entering and leaving or different vehicles. In research conducted at the Starkey Experimental Range Station as few as 4 cars per day were defined as “high” disturbance levels, and caused elk to show avoidance behavior.</p> <p>No helicopter herding operations were conducted along I-90 by WDFW in February or March 2013. However, between December 15, 2012 and January 4, 2013, prior to implementation of the winter closure, approximately 12-14 elk were hit on I-90 west of Vantage. On January 4th, 2013 WDFW used a helicopter to locate and herd elk from near I-90 back onto the Wildlife Area. Washington State Patrol implemented a rolling slow down during the herding operation.</p> <p>The winter closure was implemented February 1st, 2013 and there were no further elk/vehicle collisions on I-90. WDFW continued to haze elk and use Master Hunters along the I-90 corridor to reduce the potential for further collisions.</p> <p>The behavior of elk near the highway is a classic case of habituation. Unlike traffic on primitive roads, highway traffic is continual and predictable, and people do not stop and approach elk on foot, shoot at them, etc. as they often do on the wildlife area. The fact that the elk, in time, have come to tolerate the highway traffic does not indicate how they will respond to vehicle traffic on primitive roads and it is not supported by the scientific literature.</p>
<p>3. Why have there been no SEPAs done for the prior 6 years of this closure?</p>	<p>The Whiskey Dick Wildlife Area Closure that was implemented in 2013 was a “one-time” closure intended to be superseded by decisions through the Naneum Ridge to Columbia River Recreation Plan and it was not the same as the current proposal. The SEPA process has been utilized this year to allow the public additional opportunity to review and comment on the proposal.</p>
<p>4. Why were no SEPAs ever done for the Joe Watt, Robinson, Wenas, and Oak Creek WLA winter closures?</p>	<p>The 4 winter closure areas listed, which have existed for many years, and many other access management actions around the state, were grandfathered under the new policy.</p>
<p>5. Isn't your assertion that private land damage has decreased during the last 6 years directly attributable to the efforts of Master Hunters? There is no quantifiable evidence that the Winter Closure has any effect on elk movement in or out.</p>	<p>We acknowledged in the SEPA checklist that numerous management actions, one of which was the implementation of a winter motorized closure, likely contributed to the decrease in damage complaints. The overall effort has been to increase disturbance (hunting, herding, hazing, etc.) to the elk that are on or near private agricultural lands and to decrease disturbance on the public Wildlife Area to the east. When looking at data collected from 99 GPS collared female elk from 2009-2012, we observed that only 0.24% of locations were in agriculture fields during the closure period of February 1 to April 30.</p>
<p>On the contrary, Dr. McCorquodale concludes in his 2013 Colockum Elk Study that elk move in response to plant</p>	<p>Migration cues that prompt elk to move large distances from summer range and winter range do, in part, come from</p>

<p>community cues—in other words they follow the grass.</p> <p>I have attached, per your request, a copy of one page of the petition we circulated in 2013 which 559 people signed opposing the Whiskey Dick Winter Closure. Senator Holmquist Newbry, Representatives Warnick and Manweller, and the Kittitas County Board of Commissioners all have the complete copies. The originals are available at your request. Our challenge to this winter closure remains resolute.</p>	<p>vegetation cycles and environmental factors. However, daily elk movements during winter are influenced by numerous other factors such as weather, disturbance, forage, predation, etc.</p> <p>Thank you.</p>
<p>Lana Thomas Cruse</p> <p>I am writing in opposition to DNS 13-082 Whiskey Dick Wildlife Area Seasonal Road Closure – Kittitas County for the following reasons:</p> <p>I am disappointed that WDFW continues to not effectively use public participation in the decision making process for the management of public lands. There is a pattern of WDFW personnel deciding what they are going to do, then doing minimal public input, when the decision has already been made. If WDFW had a pattern of effectively using public participation in a transparent decision making process, trust and support would improve.</p> <p>In June of 2007 the “temporary” winter closure was proposed for two years. Here we are 6 ½ years later looking at another “temporary” winter closure. At the January 7, 2013 Elk Study meeting it was announced that the winter closure would be temporary for 2013 and then permanent after that. Is this another example of an “only temporary closure when first promised” becoming another permanent closure?</p> <p>The Big Game Management Roundtable group and Director Anderson have both gone on the record that the closure was needed for reducing agricultural degradation, and not herd health. The winter closure has not been effective in reducing agricultural degradation. The elk are not only on agricultural and private land, but they have been on the old Vantage Highway and interstate freeway during the winter closure. I recreate in this area year round as a law abiding citizen, respectful of both the animals and the land. It is one of the few areas available to motor vehicles during the winter months, as snowmobile grooming trails and other WDFW closures restrict usage elsewhere. During extreme winters, motorized vehicles cannot access all areas of the Whiskey Dick.</p> <p>Studies done on the Colockum elk herd determined that elk go where the food is. If WDFW wants to encourage elk to stay on public lands, they need to improve their rangeland. This is</p>	<p>For the past 6 years, there have been annual public meetings in Ellensburg to discuss very similar winter range proposals, the Colockum Elk Study and the related issues. WDFW is also participating in the Naneum Ridge to Columbia River Recreation Plan process where this issue has been discussed at several other public meetings.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p> <p>Agricultural conflicts have been reduced, though not eliminated, through a series of management actions, including the seasonal winter range restrictions of the past 6 years. Elk numbers in the vicinity of the highways did increase last year and again this winter, but those problems started in late December and early January, when no winter range restrictions were in place.</p> <p>When looking at data collected from 99 GPS collared female elk from 2009-2012 we observed only 0.24% of locations in agriculture fields during the closure period of February 1 to April 30.</p> <p>Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. We acknowledge that the same characteristics that attract elk to the Whiskey Dick winter range are also attractive to both motorized and non-motorized recreationists.</p> <p>Elk do seek food during winter (and year round) but they also seek security from disturbance. During average winters, there is ample forage for Colockum elk on the publically owned</p>

<p>especially important because the Colockum elk herd has increased in number to the point that poorly managed public lands are not going to support the existing herd.</p>	<p>winter range. During 2013, the Colockum Tarps fire burned approximately two thirds of the Colockum winter range and produced more uncertainty about elk distribution for this winter. However, most of the area within the proposed winter range closure was south of the fire and retained more forage. This temporary forage condition supports this proposal to close most roads within the Whiskey Dick Wildlife Area.</p>
<p>Sharon Rose I'm writing in response to the SEPA the WDFW is going through and the consideration of opening a lower road into the Whiskey Dick area. I am NOT in favor of this as the lower road gives easier access to the Colockum wintering grounds and thus would allow more disturbance of these animals by humans. I don't understand the WDFW sometimes; if it truly is a department committed to protecting our wildlife then why even consider something so invasive to a herd of elk? It has been shown time and again that prey animals ARE disturbed by human activity and tend to suffer from that activity! Hey, don't recreate the wheel; protect the animals your agency is supposed to protect and let human beings go recreate in the malls.</p>	<p>Late Comments – No Reply</p>
<p>Sierra Club – Mark Lawler We are writing to provide comments on the Determination of Nonsignificance (DNS) 13-082: Whiskey Dick Wildlife Area Seasonal Road Closure. We have a strong history of conservation on this landscape, and have supported the existing winter closure since 2008. While we continue to support the winter closure, we disagree with your proposal to open a through road bi-secting the closure area. The lands covered by this closure were purchased with a purpose to “provide big game winter range and upland bird habitat, and also to provide diverse wildlife related recreational opportunities such as hunting, fishing, and wildlife viewing.” The management goals as stated in policy for this area “are to preserve habitat and species diversity for both fish and wildlife resources, maintain healthy populations of game and non-game species, protect and restore native plant communities, and provide diverse opportunities for the public to encounter, utilize, and appreciate the wildlife and wild areas.” With over 640 miles of groomed snowmobile trails in Kittitas County, it is clear that there are a multitude of opportunities for this activity. While the need for additional off-road vehicle access is limited, the value and need for wintering habitat that helps stressed species survive is great, and must be prioritized. Absolutely no information was presented in the DNS documentation, SEPA checklist, or associated analyses tied to the Naneum Ridge to Columbia River Recreation Planning Process that shows this area can meet these objectives and sustain higher levels of human disturbance in winter. This decision is also circumventing the public discussion around this collaborative planning process on how to manage access in balance with natural resources into the future. Your own letter presenting this proposal displays the</p>	<p>Late Comments – No Reply</p>

<p>effectiveness of the widely supported existing closure by stating, "With implementation of the seasonal motorized vehicle restriction, hunting restrictions and other management actions, private land damage complaints have decreased, total herd size has increased, the herd size in the southern portion of the winter range has increased, and antlerless harvest opportunities have been partially restored. Not all of these positive trends can be attributed to the restriction of motor vehicles, but it has been one of several related management actions."</p> <p>We support the ability of the public to enjoy recreational opportunities to experience the wild places and wildlife in our state, but fail to see how opening a motorized through route in a key winter closure area protecting a statewide priority elk herd achieves this. Please withdraw the proposal to open the through road, and maintain the winter closure as it has stood since 2008.</p>	
<p>Laura Schiltz</p> <p>I fully support the winter closure of the Whiskey Dick area to provide some peace for the Colockum elk herd after a stressful fall hunt, and while this elk herd faces so many other threats that impact their health and survival. I completely oppose the DNS that suggests there is no impact to opening a road through the middle of the seasonal closure that would not only reduce its impact, but likely lead to unauthorized use that you have no capacity to manage or hold to accountability.</p> <p>I must believe that the proposal to open this road is a response to the few loud voices that have arisen and impact politics last legislative session, but I remind you that these are public lands that are first and foremost to provide habitat for wildlife. When we have an elk population that is valued in our state not only for its existence and our ability to view it, but also for its value to the hunting community - I find it impossible to believe that any additional disturbance to it would be in compliance with your elk management policy or mission. I have also been aware that a larger public planning process is underway that is addressing the question of longer term recreation planning in this area that is in balance with a healthier elk herd, so why would you make this change to the existing management for one year prior to the decision about the long-term management based on science and public comments.</p> <p>I not only oppose the DNS, but suggest that you return to a one year of continued complete winter closure to motorized use. There remains value to people and the recreational community even with this closure with the experience of snowshoeing and winter skiing. Then, open the dialogue about the potential impacts of this road opening through a real public process based on your informed alternatives through the larger landscape recreation planning process. These are public lands of all members of Washington state, not just a few loud local voices. Please count my support for a complete winter closure and management that promotes a healthy herd as equally as those that clearly impacted this decision.</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>WDFW will continue to participate with the Department of Natural Resources in the Naneum Ridge to Columbia River Recreation Plan process.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>Randy Hein</p> <p>I wish to express my thoughts regarding winter usage by</p>	

<p>motorized vehicles in the Whiskey Dick Wildlife Management Area. I am adamantly opposed to any winter usage of the Whiskey Dick area by motorized vehicles.</p> <p>I was heavily involved with the Musser & Bracken elk captures for their study regarding elk ranges, habitat usage etc. We captured elk in the Whiskey Dick, Quilomene, Takison and Tarpiscan drainages during winter. Elk and deer are most vulnerable to stress during winter. Motorized vehicle access in those drainages during any season will cause them to move away from the disturbance. With cold temperatures the ungulates often burn more fat derived calories than they consume on winter range. The Whiskey Dick area is a "banana belt" compared to higher elevation range and cheat grass will green-up in fall and winter. Provided there is not significant snow cover, the early cheat grass will aid in sustaining the elk during winter. The last thing the WDFW should allow is motorized usage on elk winter range that would move the animals away from any forage. Also, if motorized vehicles are permitted in the Whiskey Dick during winter, elk will either swim the Columbia or more into private land to the west in Kittitas County.</p>	<p>Thank you for your support and for your assistance to WDFW during the earlier Colockum Elk Study.</p> <p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p>
<p>Safari Club Intl. – Deborah Barrett</p> <p>As a conservationist, outdoor enthusiast and passionate hunter, I recognize the importance of balance. After studying information pertinent to the Whiskey Dick Wildlife Area Seasonal Road Closure and discussing the objectives of this proposal with numerous WDFW department personnel, I believe the proposal identifies a valid problem and offers a plausible solution. As stated in the proposal, WDFW has been given a mandate: "...to preserve, protect and perpetuate fish, wildlife and their habitats, and to maximize sustainable wildlife-related recreation..." Those of us who actively enjoy the bounty of our state need to recognize that actions such as the above proposal are reflective of this mandate, and although initially limiting, sometimes necessary if we are to coexist and remain balanced in our society. I appreciate the transparency and effort WDFW has put forth in dealing with this issue.</p>	<p>Thank you for your support.</p>
<p>WA Backcountry Hunters – Gregg Bafundo</p> <p>The Washington Chapter of Backcountry Hunters and Anglers fully supports the temporary seasonal closure of the roads in the Whiskey Dick Wildlife Area. We have supported these closures in the past due to their benefits to the Elk that winter there and the protections provided to the local farmers. It is well known and proven by science that our wildlife fair better when roads and their use is kept to a minimum. This closure, being temporary and seasonal allows for recreation and hunting while providing needed protections for our elk. Originally these closures included the lower roads along the Columbia River. We would like to see these protections remain. Even without these lower closures we still support.</p>	<p>Thank you for your support.</p> <p>Comment noted.</p>
<p>WA Native Plant Society – Carmen Knoke</p> <p>The Central Washington Native Plant Society, Central Chapter submits the following comments on the DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE. Previously, WNPS Central submitted comments to the Naneum Ridge to Columbia River Recreation Plan of which the Whiskey Dick</p>	<p>The status quo that this proposal is based on is the current</p>

<p>Wildlife Area is a part. In those comments, WNPS Central expressed support for maintaining the closure of the Whiskey Dick winter range to motorized access from Feb. 1 to April 30. We would like to reiterate that position in the comments submitted to this SEPA.</p> <p>The proposal for changing the closure to motorized access on all roads in the winter range to opening one through road from the Quilomene Ridge Road to Gingko State Park is not justified by the accompanying SEPA Checklist. Neither is a persuasive rationale provided in the summary or Checklist why this road should be opened during the closure to motorized access now as a change from the management action of the last five years. The Checklist does, however, provide clear evidence and support based on science why motorized access on roads in the winter range should be prohibited during Feb. 1 through April 30.</p> <p>We concur with the specific points made in the previously submitted letter from the Kittitas Audubon Society and are also concerned about the timing of the proposal to allow motorized traffic.</p> <p>Naneum Ridge to Columbia River Recreation Plan is also addressing the winter range options and scheduled to conclude by summer 2014, it seems contrived to rush to establish a different management strategy for this season. The closure can and should be maintained as it has been for the previous five years. There may or may not be a different management strategy when the Recreation Plan concludes. WNPS Central would like to reiterate once more our support for prohibiting motorized access to all roads in the Whiskey Dick winter range from Feb. 1 to April 30.</p>	<p>(December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>WDFW will continue to participate with the Department of Natural Resources in the Naneum Ridge to Columbia River Recreation Plan process.</p> <p>Longer term decisions about the management of the winter range will be made as part of the ongoing Naneum Ridge to Columbia River Recreation Plan process, but since that process is incomplete, a short term decision for this winter is required. Although a temporary closure similar to this proposal is one of the two options being considered for winter access management in the Recreation Plan, this proposal is independent from that long term planning process.</p>
<p>WA Native Plant Society – Becky Chaney</p> <p>In response to member concern, I have been reviewing documents regarding the Whiskey Dick Wildlife Area Seasonal Road Closure including the DNS and the E Checklist for the Washington Native Plant Society (WNPS).</p> <p>Before preparing comments for WNPS, I would like to confirm that my understanding of this proposal is correct and to clarify some questions that come to mind.</p> <ul style="list-style-type: none"> • I understand that the proposal restricts the winter access of motor vehicles within the Whiskey Dick Wildlife Area however the proposed restriction is less than that implemented from 2008-2013, It would not restrict access to an “open road”, previously closed, that traverses the Whiskey Dick Wildlife Area from its north-central border to the south-eastern border. <ul style="list-style-type: none"> o Is this correct? o If this is correct, what is the reasoning for the decreased restriction (“open road”) for 2014? • Has there been a request for the decreased restriction and if so can you say what user groups are requesting it and why? 	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>Yes</p> <p>Our goal is to develop a balanced management approach that continues to provide for the protection of fish and wildlife resources while providing compatible recreational opportunities. The temporary winter closures that were implemented on the Whiskey Dick Wildlife Area during the past 6 years were intended to achieve that balance.</p> <p>Yes. Kittitas County Field and Stream Club, Hunter’s Heritage Council, and Washingtonians for Wildlife Conservation have indicated a preference for complete removal of the winter</p>

<ul style="list-style-type: none"> • The Environmental Checklist only reflect the impacts of the proposed road closures compared no road closures and does not reflect the addition of an “open road” in comparison to the closure of all roads. Although this may be technically correct, it seems misleading as it is my understanding that the norm for the last 5 years has not included the “open road”. <ul style="list-style-type: none"> o Is there a reason that information on the impacts of re-opening the road should not be added to the checklist? o Since these impacts are not included in the checklist or accounted for in the DNS, could they be sent in a separate communication to our organization? • Lastly, are you tracking the number and health of the elk population in comparison to historical levels for the area? <ul style="list-style-type: none"> o Could you provide studies available on the interaction between the elk and native plant habitat within the Whiskey Dick Wildlife Area if any are available? <p>Thank you so much for the opportunity to ask questions regarding the proposal and for your time in considering our questions. WNPS appreciates the care and thought that goes into managing our public lands.</p>	<p>motorized restriction.</p> <p>WDFW is not proposing the opening of a road, but the closure of most of the roads that are currently open within the Whiskey Dick portion of the winter range. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, so they are not the starting point for this proposal.</p> <p>Yes, through annual population surveys during late winter/early spring.</p> <p>No known studies.</p>
<p>Wenatchee Sportsmen’s Assoc. – Dave Gimlin</p> <p>The Wenatchee Sportsmen’s Association is opposed to the opening of the road in the southeast area of the closure area. Our reasons include the fact that opening this road will allow winter access to most of the elk wintering area clear from the Vantage highway to the West Bar. In a normal snow year this area is not easily accessible due to snow pack. If this road is opened then a much larger area of the elk winter range will be subject to human disturbance. There has already been elk killed on the Quincy highway this winter, and more use can push more elk across the river. Vehicle disturbance could also push more elk south and west into the Kittitas valley where they already cause many problems. The main reason we oppose this road opening is because according to Washington Department of Fish and Wildlife biologists the elk herd in the local area (Colockum, Quilomene and Whiskey Dick) go into the winter in minimal health to survive through to the spring with the quality of feed available on the winter range.</p> <p>We do support maintaining the winter area closure that has been in force for several years as it helps the elk and deer survive through the winter. We would also support a larger winter closure area.</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not represent the status quo.</p> <p>WDFW is not proposing the opening of a road, but the closure of most of the roads that are currently open within the Whiskey Dick portion of the winter range.</p> <p>Under this proposal, most roads in the Whiskey Dick Wildlife Area and especially those in the central and western portions would be temporarily closed during February-April 2014. The route that is proposed to remain open was chosen because it is near the eastern edge of the winter range and farthest from the agricultural areas to the west. Data from the Colockum elk study indicated that the elk used the eastern portions of the winter range less than other areas during spring. WDFW roads that are west of the Wild Horse Wind Farm, closer to agriculture, are outside the Whiskey Dick Wildlife Area and are not included in this proposed temporary closure.</p> <p>Comment noted.</p>
<p>Win Charlton</p> <p>I would strongly object to changes in the present status for the Whiskey Dick Wildlife Area seasonal road closure, ESPECIALLY the opening of the motorized route along the Columbia River through the State Park up to the Quilomene Ridge road. I am a resident of Ellensburg, a hunter and fisherman, and don’t like seeing public lands closed to access but believe that the winter range this provides takes</p>	<p>The status quo that this proposal is based on is the current (December 2013) condition. Therefore, if WDFW took no action, the same roads that are currently open May through January would remain open year-round within the Whiskey Dick Wildlife Area. The temporary restrictions on the use of motor vehicles that have been in place during the previous 6 winters were individual, short-term actions, and do not</p>

<p>precedence over access.</p> <p>I have personally been out in this area during the winter months, before the closures were in effect, and witnessed the detrimental effects to the deer and elk herds of regularly traveled roads plus all the off/closed road travel that results due to the inability to enforce the closures.</p> <p>The opening of the State Parks road will have a very negative impact on the elk herds (especially the bigger bulls) using this area for winter range.</p>	<p>represent the status quo.</p> <p>Comment noted.</p> <p>WDFW is proposing to temporarily close most of the roads that are currently open within the Whiskey Dick Wildlife Area. This proposal differs from previous years' winter closures in that a single road will remain open to motorized travel on the eastern side of the wildlife area.</p>
<p>WSDOT – Rick Holmstrom</p> <p>No comments.</p>	
<p>WSDOT – Scott Anfinson</p> <p>This motorized access, though minor in nature and scale, is a source of disturbance that wasn't present during these months since 2008. This could increase wildlife/vehicle collisions on Interstate 90 adjacent to the wildlife area by causing elk in particular to seek areas away from disturbance, causing displacement south onto the Interstate. During winter of 2012, a large herd of elk inhabited the median area of I-90, and motorized traffic on the wildlife area could exacerbate this situation</p>	<p>WDFW is not proposing the opening of a road, but the closure of most of the roads that are currently open within the Whiskey Dick portion of the winter range.</p> <p>Comment noted.</p> <p>Elk numbers in the vicinity of the highways did increase last year and again this month, when no winter range restrictions were in place.</p>
<p>Allan Charlton</p> <p>I am in total support of this seasonal road closure. With our growing population we need to change with the times. Modern recreational vehicles have the ability to go nearly anywhere at any time of year. The roads in this area are rough, but technology enables high speed travel to areas that used to seem quite remote. I speak without prejudice because I am a user of this land with a jeep and motorcycle. I feel very strongly that this area should be closed so that the wildlife that is struggling to survive the winter can live without much human harassment. With all the recreational vehicles and the year-round Native American hunting, our wildlife deserves this proposed winter refuge. Anyone not supporting the proposal seems very selfish.</p>	<p>Thanks for your support.</p>